

APPENDIX I

Agricultural Analysis

**AGRICULTURAL ANALYSIS
PEACEFUL VALLEY RANCH
ESTATE RESIDENTIAL DEVELOPMENT
PEACEFUL VALLEY RANCH, LLC
Case Numbers: TM 5341RPL5; R03-015; MUP04-048
LOG NO. 04-19-007
Account Numbers: WN#7426, CP 17080**

Located at 14135 Campo Road, Jamul, CA 91935
in the County of San Diego, California
APN'S 597-050-13; 597-060-02; 597-070-02 and 07

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TABLE OF CONTENTS

TABLE OF CONTENTS.....	1
SUMMARY OF FINDINGS	4
AGRICULTURAL ANALYSIS.....	6
INTRODUCTION	6
Purpose And Scope	6
PROJECT DESCRIPTION.....	7
Location And Legal Description.....	8
Equine Operations.....	9
Public Stable & Hunter/Jumper Facility	10
Private Stable/Polo Training Facility	11
REGULATORY FRAMEWORK	16
California Department of Conservation, Division of Land Resource Protection's Farmland Mapping and Monitoring Program	16
California Land Conservation (Williamson Act).....	16
San Diego County General Plan	16
San Diego County General Plan - Jamul-Dulzura Subregional Plan.....	17
County Zoning Ordinance.....	17
ENVIRONMENTAL SETTING	18
Historical On-Site Agricultural Land Uses	18
Current Agricultural Land Uses	24
Former Good Faith Organic Farm	24
Dry Land Farming.....	26
Water and Irrigation	27
Environmental Hazards.....	29
NATURAL RESOURCES	30
Natural Resource Inventory	31
California Resources Agency Important Farmland Mapping.....	34
Interpretation of Natural Resources	41

ECONOMIC RESOURCE	41
Economic Resource Inventory	41
Interpretation of Economic Resources	42
THRESHOLDS OF SIGNIFICANCE.....	43
ANALYSIS OF PROJECT EFFECTS AND SIGNIFICANCE DETERMINATION	44
Direct Impacts	44
California Land Evaluation And Site Assessment Model Analysis	44
Farmland Classifications Analysis.....	47
Economic Analysis	48
Agricultural Preserves And Williamson Act Contracts Analysis	51
Compatability With Surrounding Land Uses.....	51
Analysis of Potential Conflicts, Indirect and Fringe Impacts on Surrounding Agriculture	52
Analysis Of Potential Conflicts, Indirect and Fringe Impacts Of On-site Equine Uses On Surrounding Agriculture	54
Consistency With County General Plan Policies.....	55
County General Plan Land Use Element	55
County General Plan Open Space Element	56
Jamul-Dulzura Subregional Plan	56
Potential Conflicts With Permitted Uses On Agriculturally Zoned Lands Analysis	58
CUMULATIVE IMPACTS.....	58
Cumulative Impacts to Farmland of Local Importance	62
Cumulative Impacts to Grazing Lands.....	63
PROJECT DESIGN AND MITIGATION	65
CONCLUSION.....	66
BIBLIOGRAPHY	70

FIGURES AND TABLES

Figure 1. Vicinity Map.....	12
Figure 2. Aerial Photograph.....	14
Figure 3. Existing and Proposed General Plan Designations and Regional Categories - Peaceful Valley Ranch	20
Figure 4. Existing and Proposed Zoning Regulations - Peaceful Valley Ranch	22
Figure 5. Important Farmland Mapping Categories Map	38
Figure 6. Revised Farmlands Map	40
Table 1. Soils Summary	32
Table 2A. Farmland Mapping Categories Per CRA Important Farmland Mapping.....	37
Table 2B. Farmland Mapping Categories Per Category Definitions And Historic Use	37
Table 3. LESA Final Score Summary.....	47
Table 4. Historic Agricultural Revenue	49
Table 5. Zone of Influence - Parcels By Use, Frequency and Size	52
Table 6. Specific Projects Within Cumulative Analysis Area.....	61
Table 7. Extent of Cumulative Project Impacts	62
Table 8. Six-Year Acreage and Value of Grazing Land in San Diego County	64

APPENDICES

- A. Good Faith Organic Farm Product List
- B. Phase I Environmental Site Assessment by RBF Consulting, dated January 24, 2003, under separate cover; Report of Site Reconnaissance by Kleinfelder, Inc., dated May 15, 2003, under separate cover, Limited Environmental Assessment and Recommended Action Plan, dated November 10, 2006.
- C. The California Agricultural Land Evaluation and Site Assessment Model and Zone of Influence Inventory.
- D. Peaceful Valley Ranch Horse Boarding, Breeding and Training Agribusiness, by Dennis Moser of Moser Ventures and Jocelyn Parker
- E. San Diego County Code §63.404 Notice to Prospective Buyers and Occupiers
- F. Cumulative Projects from the San Diego County Planning Department and the Cumulative Projects Map
- G. Consultant's Resume

SUMMARY OF FINDINGS

1. The proposed project is compatible with existing agriculture and surrounding land use.
2. When the criteria of the California Agricultural Land Evaluation and Site Assessment Model (LESA) are applied to the project, a total score of 36 results which is less than the score of 40 which is required for a project to be considered significant as an agricultural resource.
3. The loss of active agriculture including grazing and dryland farming lands are not cumulatively considerable when viewed in connection with the impacts of other projects because: 1) the organic farm has relocated to another location in the county, therefore there is no actual loss of agricultural land use or revenue; 2) the dryland farming/grazing lands do not provide a significant contribution to county agricultural revenue neither individually nor cumulatively; 3) there is a high level of replacement lands available for dryland farming and grazing; and 4) the proposed equine operations are compatible with potential future agriculture and the project density provides parcel sizes that can support future agricultural uses.
4. The area of the site designated as Unique Farmland according to the Farmland Mapping and Monitoring Program maps, covers areas that were previously used for dryland farming. Dryland farming and grazing lands clearly do not meet the Unique Farmland definition because they are not high value crops. Therefore, there are no direct impacts to Unique Farmlands.
5. The site is not encumbered by a Land Conservation Agreement and is not within an Agricultural Preserve (a Williamson Act agricultural preserve).
6. The topography and indigenous ground water supply limit this site as an agricultural resource. Further, the type of dry land crop produced on the site has a high degree of substitution from crops produced throughout the west, so its loss is inconsequential.

7. Land use in the neighborhood is 98% non agricultural land use or vacant. The amount of vacant land is approximately 26%. Dryland farming accounts for about 1% of land use.
8. The site is within the coastal transitional area climate.
9. The subject's zoning and placement is within land zoned A72 General Agriculture and designated Estate (17) and Multiple Rural Use (18) within the San Diego General Plan. A General Plan Amendment is being requested to make the entire site Estate (17) and a rezone is proposed to change the minimum parcel size of the A72 zone from 8 acres to 2 acres. The proposed residential subdivision is consistent with the A72 zone and the (18) Multiple Rural Use Designation. The private equestrian polo field will be allowed upon the issuance of a major use permit. Because the project includes an equestrian use that will be designed in a way that is compatible with the proposed residences and be compatible with potential future agriculture, the project will not conflict with zoning for agricultural use.

AGRICULTURAL ANALYSIS

PEACEFUL VALLEY RANCH ESTATE RESIDENTIAL DEVELOPMENT

APN'S 597-050-13; 597-060-02; 597-070-02 and 07

INTRODUCTION

Purpose And Scope

Approval of an estate residential development, a public equestrian facility, private equestrian facility and fire station is being sought on 181.31 acres in the Jamul Community Planning Area. This project is called the Peaceful Valley Ranch. The site lies northeasterly along the Campo Road segment of SR-94, about one highway mile south from its intersection with Jefferson Road in the Community of Jamul (Refer to Figure 1 page 6, and Figure 2, page 7). The purpose of this report is to assist the landowners, their representatives and county staff in assessing the possible impacts of converting portions of this land to non-agricultural uses. Specifically addressed are the impacts on agriculture as a consequence of the proposed development on site, as well as the possible impact on any agricultural uses or activities within the surrounding area that development of this acreage may precipitate.

Six specific project effects are to be analyzed.

- The direct impacts on the inventory of farmland resources as quantified under the California Land Evaluation and Site Assessment Model (LESA Model);
- The acreage and percentage of significant farmland resources that will be converted to a non agricultural use within the project area;
- Any direct conflicts with regard to zoning or established agricultural policies of the County of San Diego;
- Any direct conflicts with regard to established agricultural preserves, or land conservation contracts under the Williamson Act;

- The likelihood, as a consequence of the project, of an indirect conversion of other agricultural Farmland to a non-agricultural use;
- The cumulative significance of any agricultural conversion pursuant to CEQA Guidelines using the *List of Projects Method* within the vicinity area for the proposed project.

The scope of this report is limited to the four (4) parcels of land on which development is proposed. The scope of the investigation is limited to the physical inspection of the parcel and surrounding area; project maps and technical data provided by RBF Consulting; *Evaluation of Wells at the Proposed Peaceful Valley Development*, prepared by Earth Tech of San Diego; cultural and marketing practices and production, provided by Mr. Todd Benson, owner/operator of Good Faith Organic Farm; *Peaceful Valley Ranch Horse Boarding, Breeding and Training Agribusiness*, a study by Dennis Moser of Moser Ventures and Jocelyn Parker, the future owners of the equestrian operations; *Evaluation of Potential High Groundwater Conditions and Nitrate Mass Loading Peaceful Valley Ranch, Jamul, CA.* by Wiedlin & Associates, Inc., and published documents and data in the consultant's files. Opinions and conclusions are developed based on these data.

PROJECT DESCRIPTION

The Peaceful Valley Ranch project proposes the subdivision of 181.31 acres for an estate residential development, equestrian uses and amenities, and fire service facilities. The development plan includes a total of 57 lots consisting of: one 4-acre lot for the existing ranch residence (Lot 5); forty-six 2 to 6.2-acre new estate residential lots (Lots 1-4, 6-47); a 3.7-acre lot reserved for a fire station for joint use by the Rural Fire Protection District (RFPD) and US Fish & Wildlife Service (USFWS) (Lot 49); a 6.7-acre public equestrian facility lot (Lot 48); a 28.9-acre lot for a private stable/polo training facility (Lot 51); a 3.7-acre open space lot for the protection of biological resources (Lot 50); and six private street lots. Public water will serve the project site,

with service provided by the Otay Water District. The proposed subdivision requires the approval of a Tentative Map (TM 5341 RPL3) by the County of San Diego.

The project also includes a General Plan Amendment (GPA) and rezone to amend the existing land use designation and zoning of the easterly 152.46 acres of the 181.31-acre property from (18) Multiple Rural Use (1 du/4,8,20 ac) with an A72 (8 acre minimum lot size) General Agriculture zone, to the (17) Estate Residential (1 du/2,4ac) designation with an A72 (2 acre minimum lot size) General Agriculture zone. The General Plan Amendment covers APN's 597-050-13, 597-070-02, 597-060-02, and 597-070-07. The GPA request also seeks removal of a segment of a County of San Diego Circulation Element Road, SC 760, which is currently aligned through the project site. The SC 760 is a planned two-lane Light Collector Road. The segment of SC 760 proposed for removal with the project extends from SR 94 north to Olive Vista Drive.

The project includes two equine related enterprises compatible with potential agricultural uses in the surrounding area. Since the project also includes residential development with two acre minimum parcel sizes, small scale agriculture opportunities on residential parcels may continue, in keeping with the rural nature of the community. The equestrian use involves boarding, breeding, training and sale of specially trained horses at a private horse stable and training facility/polo field on a 30.8-acre parcel (Lot 51). The equestrian component also includes a public stable and hunter/jumper facility on a 6.7-acre parcel (Lot 48).

Location And Legal Description

The address of the 181.31 acres of land in four parcels, on which the project is proposed, is 14135 Campo Road in Jamul, California. Its situs is within Section 10, T17S, R1E, SBB&M more fully described as "*. . . a portion of parcels 1,2,3,4 and remainder parcel of Parcel Map 16190 per map thereof filed in the Office of the County Recorder of San Diego County on August 16, 1990.*" The project is further identified as Assessor Parcel Numbers 597-050-13, 597-060-02, 597-070-02 and 597-070-07 and is located southeast of the intersection of Campo Road and Melody Road.

The subject property's basic shape is two rectangles, an easterly north south rectangle of about 106 acres and an east west rectangle of about 76 acres, with its westerly boundary the arc of the Campo Road rights-of-way, with an 8-acre wedge shaped notch removed in its north central portion. Its southerly property line is Rancho Jamul, the easterly boundary is the section line. Melody Road lies along the north boundary of the east west rectangle until the notch where Peaceful Valley Ranch Road assumes that role for a distance of about 550 feet until the line that would be the extension of Melody Road continues to a north south line parallel with the north south section line. The north boundary of the north south rectangle is generally parallel to the quarter section line. The approximate GPS decimal coordinates for the east-west rectangle are SE Corner 32.703N 116.861W, SW Corner 32.703N 116.867W, NW Corner 32.707N 116.87W, NE Corner 32.708N 116.860W. The approximate GPS decimal coordinates for the north- south rectangle are SE Corner 32.70N 116.856W, SW Corner 32.703N 116.861W, NW Corner 32.711N 116.860W, NE Corner 32.771N 116.8560W.

Equine Operations

The proposed equine operations are typical of many throughout the state where sufficient land is available to accommodate the blending of the "equine lifestyle" with up-scale residential uses. In some areas such as La Quinta/Indio in the Coachella Valley entire districts emphasize this use. Elsewhere such as the Santa Ynez Valley the character of the community is largely defined by the presence of various aspects of the horse industry. From the California era with its extensive ranchos such as near by Rancho Jamul, Rancho del Otay Estadillo and Rancho de La Nacion, horses for work, pleasure and competition have been a fixture in the history and commerce of San Diego County.

Modern-day San Diego County is a home to nearly all breeds of horses and all horse sports. From back yard pleasure horses and local clubs to the Sheriff Posse, municipal mounted police and border patrol units to working ranch horses, the equine

industry is an important part of the recreational industries of the county and central is maintaining the rural character of back country communities such as Jamul. Although equine uses are not technically considered agriculture as defined in the County Zoning Ordinance and in many definitions found in regulations, equine operations are supportive of and serve a similar function as agricultural operations in terms of retaining a rural character of a community.

The commercial aspects of the industry are in tandem with recreation. A growing segment of the industry is that of the hunter/jumper. There are a number of hunter/jumper facilities providing boarding and training throughout the county. In Jamul, there are approximately 6 such facilities.

Due in part to the influence of the racetrack at Del Mar, the Thoroughbred industry has grown to be an important component of the local industry. The county boasts world class stables, training and breeding facilities such as San Luis Rey Downs and world renown breeding operations such as Golden Eagle Ranch. The San Luis Rey Equine Hospital is one of a handful of major surgical and treatment hospitals in the state. Among the more notable competitions, San Diego hosts the "A" rated Del Mar National series during three weeks in the summer. There is also an "A" rated Ride America series during the summer.

The Peaceful Valley Ranch boarding, breeding and training business will bring to the local industry two principal activities, the Peaceful Valley public stable and hunter/jumper facility; and a private stable and polo training facility.

Public Stable & Hunter/Jumper Facility

The Peaceful Valley Ranch Hunter/Jumper Equestrian Facility is planned as a signature entry element located adjacent to Campo Road (SR-94). This facility is envisioned as a high-end boarding and training facility configured for arena shows and events. The facility will include barns to accommodate up to 30 horses, paddocks for daily horse turn-outs, and an arena with jumps for training and horse show purposes. Boarding and training activities will be available to the general public on a fee basis.

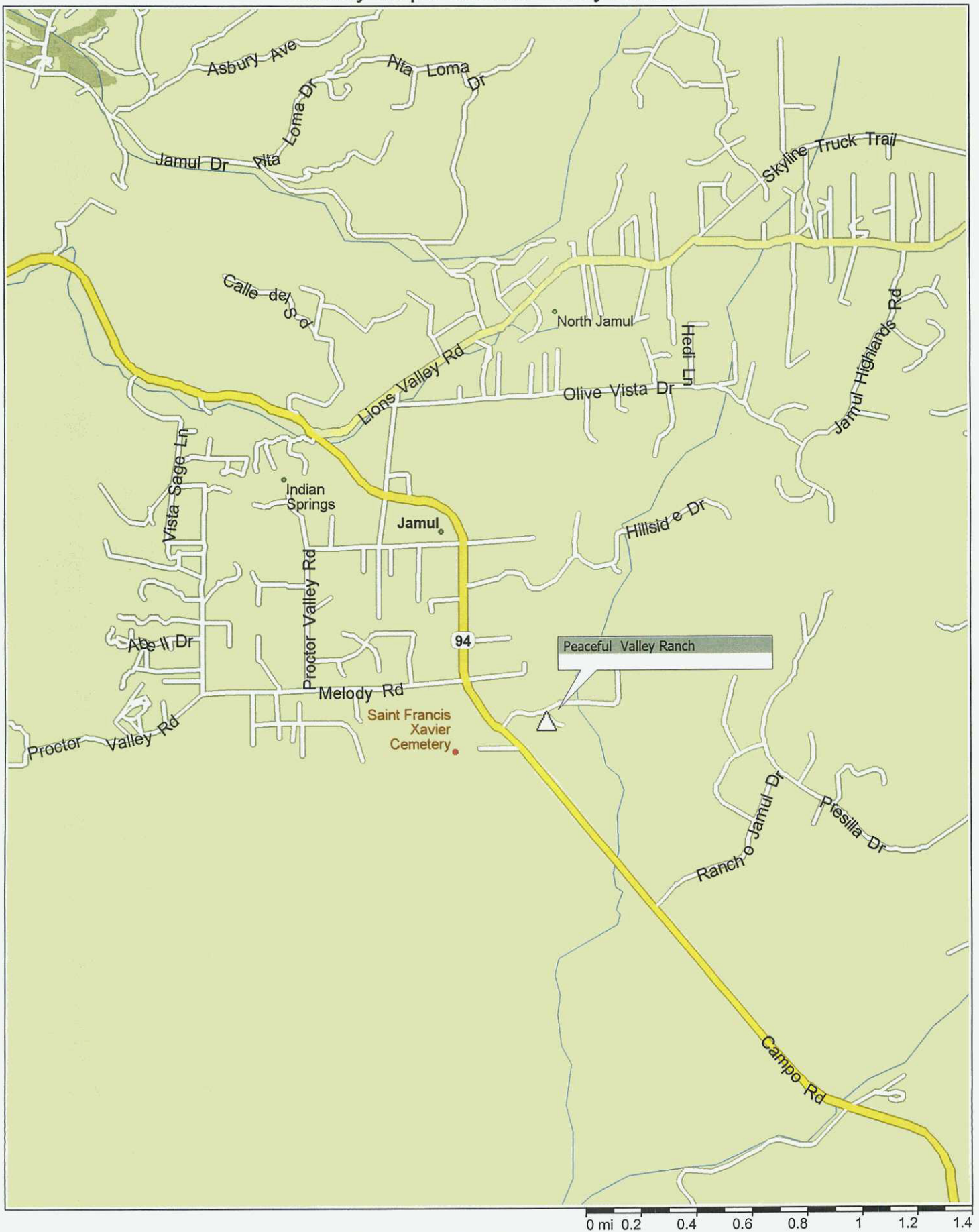
Private Stable/Polo Training Facility

Facilities for polo horse training and polo play are extremely limited in San Diego County. The San Diego Polo Club, located in Del Mar, is the region's principle club in the county. A second facility is located in Lakeside. The Lakeside polo club includes a small boarding facility and a non-regulation sized playing field. The third facility is located in Poway. This facility is also small and polo play is limited to the community riding facility arena.

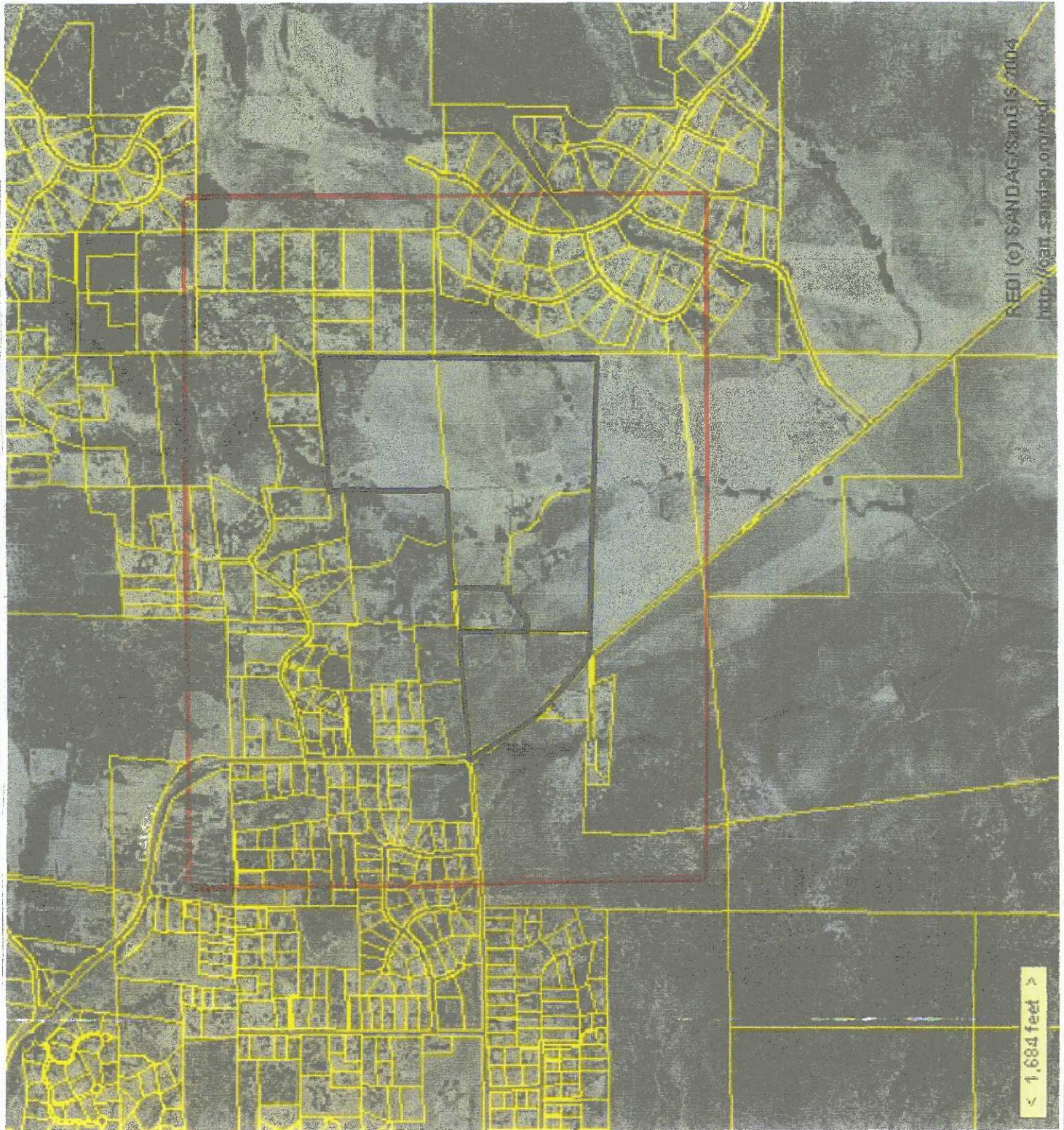
The Peaceful Valley Ranch Training Facility and Polo Field is envisioned as the premier polo horse breeding, boarding and training facility in San Diego County. The San Diego Polo Club's fields are on land leased from the County. As a condition precedent of obtaining the lease, the fields must be made available for public purpose. Among the other uses of the polo fields are the Surf Soccer Tournament. Because the Peaceful Valley facility is on land held in fee, greater flexibility and focus on the business of polo is possible. The proposed operation will provide specialized breeding, boarding and training. In addition to breeding, the operation will acquire Thoroughbred and other breeds of horses that are unsuitable for racing. These horses will be boarded, trained and sold to polo enthusiasts. The facility will emphasize the professional standards inherent in training quality polo ponies and the sport of polo. The barns are scheduled to accommodate up to 48-polo ponies. The area will include paddocks for daily turn-out, a regulation size polo field (160 yds. x 300 yds.), with run-on areas and integrated training track, exercise arena, bullpen, hot walkers, hay barn, manure storage area including metal storage bins screened from view, operator office area and restroom, horse trailer staging / parking area, and automobile parking.

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Vicinity Map Peaceful Valley Ranch



PEACEFUL VALLEY RANCH ZONE OF INFLUENCE INVENTORY MAP



REDI (c) SANDAG/SanGIS 2004
<http://san.sandag.org/redi>

< 1,684 feet >

REGULATORY FRAMEWORK

California Department of Conservation, Division of Land Resource Protection's Farmland Mapping and Monitoring Program

The goal of the Farmland Mapping and Monitoring Program (FMMP) is to provide data to decision makers for use in planning for the present and future use of California's agricultural land resources. Government Code §65570 requires *The Farmland Mapping And Monitoring Program* (FMMP) of the California Department of Conservation to collect and report land use acreage and conversion data by June 30 of each even-numbered year. The initial mapping year for many *Important Farmland Maps* is 1984. The base year for areas introduced to the FMMP inventory is since 1984 is the even-numbered year closest to their compilation date. The FMMP publishes a biennial *Farmland Conversion Report* which details county land use acreage by category and the types of conversion which have occurred during each two-year reporting cycle.

California Land Conservation (Williamson Act)

The creation of Agricultural Preserves is enabled under The Williamson Act. The Williamson Act is the name given to legislation intended to afford property tax relief to the greatest number of farmers and ranchers in order to assist in their economic survival. Under a Williamson Act Contract (Land Conservation Contract), property is taxed by the County based upon its agricultural income producing capability.

The site of the proposed project is not encumbered by a Williamson Act Contract and is not within an Agricultural Preserve.

San Diego County General Plan

The County of San Diego General Plan includes policies aimed at preserving land within specific agricultural designations in the unincorporated areas of San Diego County. These agricultural lands are designated either (19) Intensive Agriculture or (20) General Agriculture within the County General Plan. The project site has existing General Plan designations of (17) Estate Residential and (18) Multiple Rural Use. Under Policy 2.4 of the Regional Land Use Element of the County General Plan, the (17) Estate

Residential and (18) Multiple Rural Use designations provide for both minor agricultural uses and low density residential uses, but are not classified in the Land Use Element of the General Plan as an agricultural designation.

The proposed project would require an amendment to the County General Plan to reclassify the eastern 152.46 acres of the site from an (18) Multiple Rural Use Plan General Plan designation (1 du/4, 8, 20 ac) to a (17) Estate Residential General Plan designation (1 du/2, 4 ac). Refer to Figure 3 for the existing and proposed General Plan designations.

The Conservation Element of the County General Plan also provides policies that connect soils to agricultural uses within the County of San Diego. In particular, Policy 2 of the Conservation Element states that the County will analyze, improve and promote methods for preserving agriculture.

The Open Space Element of the County General Plan contains a policy pursuant to Board of Supervisors Policy I-38 specifically establishing agricultural preserves.

San Diego County General Plan - Jamul-Dulzura Subregional Plan

The project is within the Jamul/Dulzura Subregion Planning Area designated Estate (17) and Multiple Rural Use (18) within the San Diego General Plan. The project is also subject to applicable policies contained in the Jamul-Dulzura Subregional Plan, part of the San Diego County General Plan. The Jamul-Dulzura Subregional Plan contains Policies 8, 9 and 10, which are applicable to agricultural uses.

County Zoning Ordinance

The (17) Estate Residential and (18) Multiple Rural designations of the County General Plan applicable to the project site are implemented by the zoning designations and regulations. The project site has an existing zoning designation of A70 (2) Limited Agriculture applied to the existing (17) Estate Residential designated land, and A72 (8) General Agriculture applied to the existing (18) Multiple Rural Use designated land.

The project includes a rezone of the property to reclassify the eastern 152.46 acres of the 181.31-acre project site from the existing A72 (8 acre minimum lot size) General

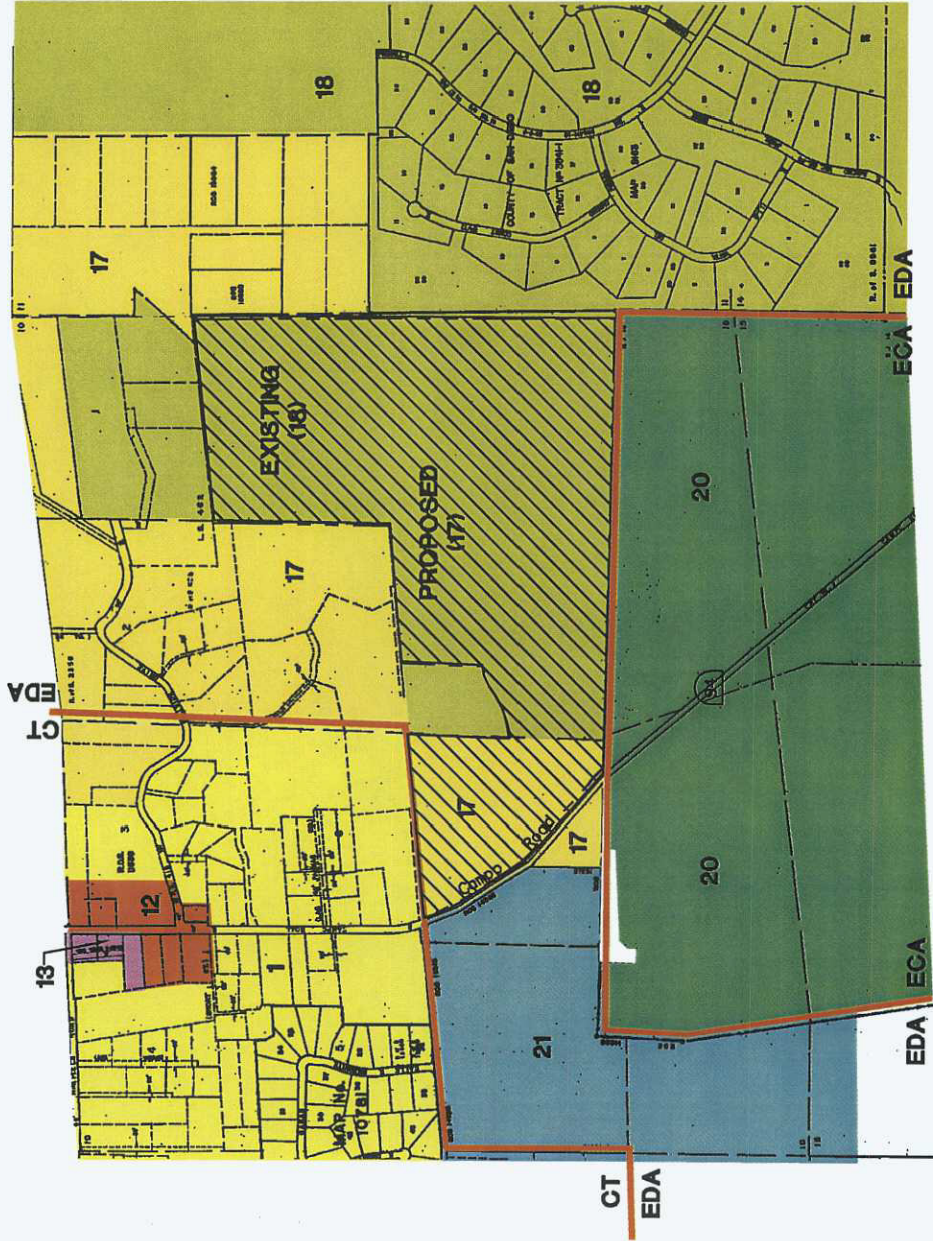
Agriculture zone to an A72 (2 acre minimum parcel size) General Agriculture zone. Refer to Figure 4 for the Existing and Proposed Zoning Regulations.

ENVIRONMENTAL SETTING

Historical On-Site Agricultural Land Uses

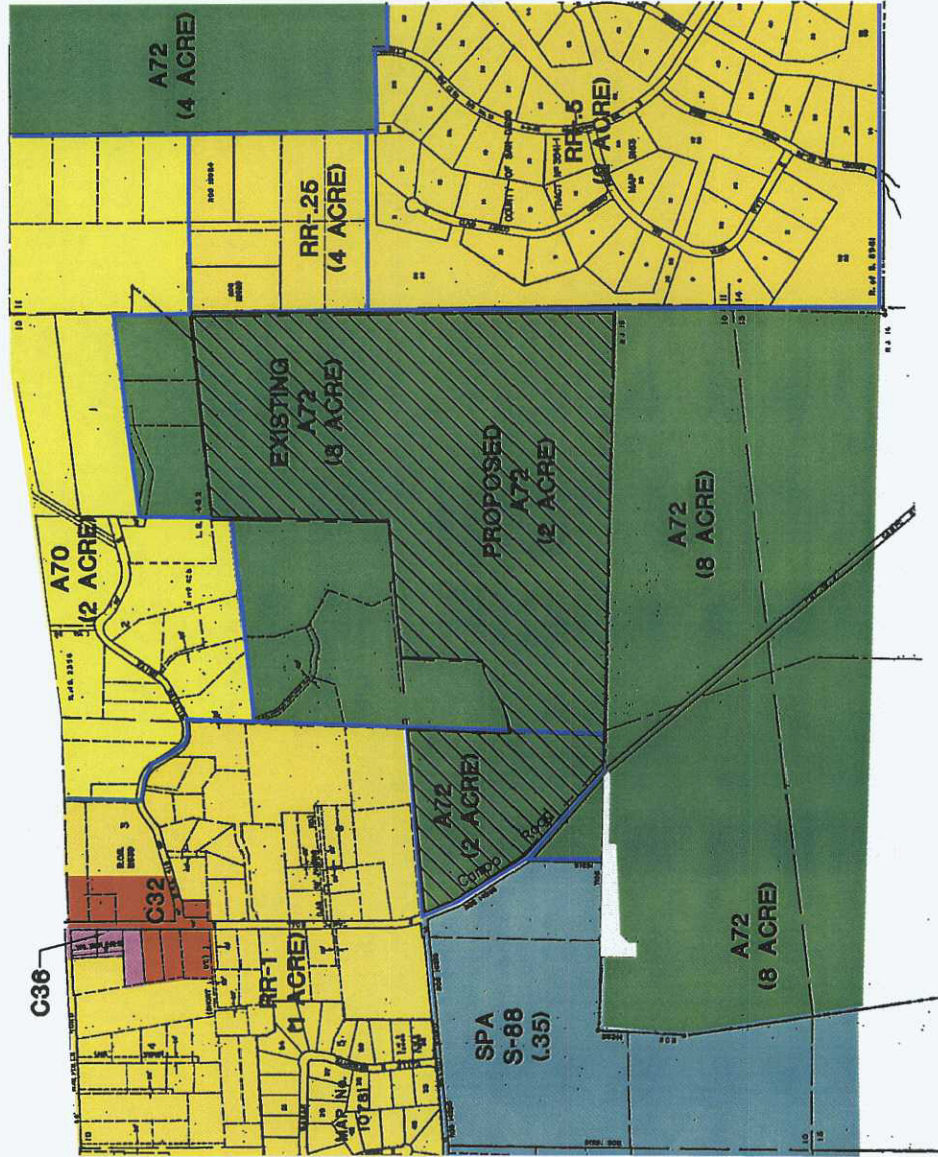
There have been two agricultural uses on the site in recent times: an organic truck farm and a dryland farm. Additionally, an existing horse stable with corrals and an irrigated pasture area encompass approximately 9.8 acres to the northwest, east and south of the organic farm fields. According to the Biological Technical Report prepared by Helix Environmental, for the proposed project, approximately 106 acres have been devoted to agriculture. Of this, 3 acres were leased to Good Faith Organic Farm of which 2.5 acres were cultivated. The Good Earth Organic Farm ceased operations and vacated the property in August 2004. The area previously cultivated by the Good Earth Organic Farm is now incorporated into the paddock area of the on-going equestrian operation. The remaining 103 acres on the more sloping portions of the site and hillsides are used for dryland crops, principally oat hay. The prior organic farm and pasture are adjacent to a 4.4-acre farmstead. The farmstead includes a 1,400 s.f. single family residence, a horse barn, a 400 s.f. bunkhouse-galley, and a 250 s.f. bathroom and packing shelter. A strong back (canvas tent over wood frame) farm labor shelter was within the 3-acre farm. The remainder of the farmstead included a well site, irrigation main lines from the storage tank on the high ground to the west, miscellaneous outbuildings and a farm equipment salvage yard.

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- PROPOSED GENERAL PLAN DESIGNATION**
- (17) - ESTATE RESIDENTIAL
- EXISTING GENERAL PLAN DESIGNATION**
- 1 - RESIDENTIAL 1, 2, 4 ACRES
 12 - NEIGHBORHOOD COMMERCIAL
 13 - GENERAL COMMERCIAL
 17 - ESTATE RESIDENTIAL
 18 - MULTIPLE RURAL USE
 20 - GENERAL AGRICULTURE 10, 40 ACRES
 21 - SPECIFIC PLAN AREA (OTAY RANCH)
- EXISTING REGIONAL CATEGORIES**
- CT - COUNTRY TOWN
 EDA - ENVIRONMENTALLY CONSTRAINED AREA
 EDA - ESTATE DEVELOPMENT AREA

Existing and Proposed General Plan Designations and Regional Categories Peaceful Valley Ranch



- ZONING REGULATIONS:**
- A70 - LIMITED AGRICULTURE
 - A72 - GENERAL AGRICULTURE
 - C32 - CONVENIENCE COMMERCIAL
 - C36 - GENERAL COMMERCIAL
 - RR - RURAL RESIDENTIAL
 - S-88 - SPECIFIC PLAN DESIGNATION (OTAY RANCH)
 - SITE

Existing and Proposed Zoning Regulations Peaceful Valley Ranch

Current Agricultural Land Uses

The past, current and proposed agricultural use of the subject illustrates how emphasis on one or another of land, labor, capital and management, the factors of production, define agricultural enterprises. The condition that determines how the factors of production are allocated and the weight given to any particular combination is market driven. Simply stated, since human activity must produce to survive, there must be a sufficient return for each factor in order for it to be employed in a particular enterprise. As of November 2006, dryland farming is the only active agricultural enterprises onsite. Dry farming on the site has been an ongoing activity for a great many years and, while an extensive land use, is of minimal economic impact.

Former Good Faith Organic Farm

The development of this small farm began in 2000. The farm leased the 3 acres comprising the farm on a month-to-month basis for an annual \$1,000 rent payable monthly. The adjacent farmstead was leased on a separate basis. Operation of the organic farm voluntarily ceased in August of 2004 and the farmstead was vacated at that time.

Good Faith used a hybrid of the French interactive and German dynamic systems combining conventional organic farming practices with the utilization of growing beds and low tillage cultivation to maintain soil tilth and increase fertility. Once developed, the use of beds with highly conditioned soils and accompanying high population of earthworms that thrive in this environment, substitutes, to a considerable degree, the need for mechanical tillage. Using a strict regimen of soil moisture control, this system maintains soil structure and fertility by stabilizing soil microorganism populations. The intended objective is to sustain a growing media where the naturally occurring ratios of macro and trace elements are present for maximum plant uptake and growth. Theory and practice of this system argue that the vigor and strength of the plants are then such that natural defenses become the principle means of crop protection so the need for applications of crop protection materials are reduced.

About twice the time is required to develop an organic farm than a conventional farm. In addition to taking approximately two years to be certified as an organic grower, considerable effort is required over a protracted period of time to condition the soils in order to sustain economic levels of quality production. Therefore, the development of an organic farm such as Good Faith substitutes time, labor and management for land, purchased inputs and capital.

Although small in size, the farming system is labor intensive. During development, purchased inputs are required, with labor being among the most costly and ongoing. For example, in addition to the husband and wife ownership team, at current levels as many as 11 workers were required during the summer and as many as 5 during the winter.

The inability to absorb sufficient overhead to hire skilled managers willing to work the long hours necessary to sustain the synergism of the farm production and off farm marketing are a constraint on attracting outside investment. Thin operating margins and limited initial cash flow similarly limits the opportunity to obtain commercial financing. With either the investor or farmer, there must be a willingness to devote the required energy, time and financial resources to the enterprise for it to succeed. In short, in economic terms, there is an insufficient return for land, labor, capital and management during the rather protracted initial development phase to sustain production without management having a stake in ownership.

Unless independently wealthy, the farmer entrepreneur is forced to accept a subsistence existence during the period of development. The value of the entrepreneur's human capital investment, or sweat equity, as it is commonly referred, is measured by the value of income that is forgone. For a farmer and his family to assume the day to day time and financial sacrifice, risks and uncertainty, organic farming typically transcends the character of an economic enterprise to one driven by a belief that the sacrifice is for a greater good.

Farms such as the previous Good Faith Organic Farm are specialty farms. Like conventional producers of crops for ethnic markets, organic farms rely on market niches.

Specialty or luxury markets are the third tier. Because of limited volume, output must receive premium prices. In order to do so, pricing is based on quality, organic appellation and product variety and uniqueness. From the pricing experience of table grapes and citrus fruits it is apparent the price received for products bearing the organic appellation is vulnerable to increases in competition. When these organic products are available in sufficient quantity to service mass markets the price premium narrows to nearly that of products produced using conventional farming practices. Good Faith was successful in adding the value necessary to compete. Its market was about evenly divided between gourmet restaurants and farmer markets. The firm produced a variety of mixed salad greens, a broad pallet of vegetables such as cucumbers, squash, tomatoes, snap beans, peas, green onions and herbs and edible flowers such as rosemary, basil and lemon verbena. The number of individual items varied from the low 20's in the winter to as many as 40 in the summer. Representative order sheets for summer and winter are included as Appendix A .

The Good Faith Organic Farm has since relocated to a new site in the North County area. Therefore, although the farm ceased operations onsite, there is no actual loss of active agriculture in the County in terms of this specific farm.

Dry Land Farming

Of the 106 acres of the property currently in agricultural use, an approximately 16-acre portion is used for on-going equine operations by the current owners and an approximately 90-acre portion is dry farmed on a crop share basis. The farming arrangement with the dryland farmer has been in place with both the current owner and the previous owner for many years at least the past 15 years. The present and historic use of this portion of the land is dry farming of oats, wheat and barley which are harvested for hay. Yields vary according to seasonal rainfall or other conditions. The typical yields vary between 1.5 and 3 tons, probably averaging somewhere around 2 tons per acre. Usually the hay is fine stemmed which makes it ideal for horses, the primary market. Hay in excess of the requirements of its customers is sold through brokers or dealers.

Water and Irrigation

Although within the boundaries of the Otay Municipal Water District (OMWD), the site, in its present state of development, relies exclusively on well water for domestic and agricultural purposes. On behalf of RBF Consulting, Earth Tech, with Del Mar Analytical providing water quality testing and evaluation, conducted a study of the ground water resources on the site. Five wells are identified in their report. Two of the wells are used for the benefit of the site, (PV-4 South Well and PV-1 "Doc's Well). One well is unused (PV-2 North Well). One well is used to provide water to an adjacent landowner (PV-3 Stoddard's Well) and one abandoned (PV-3 Hand Dug Unused Well).

Good Faith Organic Farm drew water from the south well, which is located at the south end of the farmstead along the watercourse, adjacent to the southerly property line. Water was pumped from this well and stored in a 10,000 gallon galvanized steel tank atop the hill to the west. Water from storage was drawn upon and boosted to irrigate. The irrigation water was filtered using commercial screen filters and directed to the fields through a 2-inch main. At the edge of the cultivated fields, water could be directed to two distribution systems. One system used four 1½-inch poly vinyl chloride (pvc) sub-mains and 1¼-inch pvc laterals with manual valves, risers with hose bibs to control the application of water for conditioning the beds, deep watering or applying water by sprinkler to establish or irrigate specific crops. The parallel system used 1½ and 1-inch sub-mains to deliver water to 0.5-inch poly drip tape in each of the beds.

The system was manually operated, water efficient and afforded micro control. Mr. Benson reported the farm averaged about 4,000 to 6,000 gallons per day, with 2,000 per day in the winter and 12,000 gallons per day during the peak summer periods. This translates to an average of between 0.37 to 0.55 of an acre-foot per month, 0.18 of an acre-foot in the winter and 1.10 acre-foot per month during peak summer demand. Power cost was about \$115 per acre-foot.

The single-family dwellings, including one outside the farmstead, and the barn draw water from PV-1, Doc's well. This well is located about 760' northerly from the south property line and pumps water to a 10,000 gallon galvanized steel tank adjacent to the tank formerly used by Good Faith Organic Farm. The north well (PV-2) is within the water course near the westerly north-south boundary of the northeast portion of the farm, about 500' feet south of the north property line. Aside from the irrigation infrastructure that was developed for the Good Faith Organic Farm, the site has not developed additional irrigation infrastructure. The dryland farming relies solely on natural rainfall.

Earth Tech conducted a groundwater related study to evaluate well production capacity and groundwater quality limitations for two existing wells at the site to support irrigation of 14 acres to be used for an equestrian polo field and an organic farm. Wiedlin & Associates, Inc. (W&A) conducted a subsequent groundwater related study for Peaceful Valley Ranch per the requirements of the San Diego County Department of Planning and Land Use (DPLU). The objective of this study is to evaluate the long-term sustainable groundwater yield at the site. In an interim report of findings submitted to the County Groundwater Geologist at DPLU, W&A concluded that, in addition to groundwater recharge from precipitation, the proposed development will induce an additional 22.2 acre-feet of groundwater recharge from new septic systems, landscape irrigation at individual residences, and irrigation of the equestrian polo field. W&A estimated that the 12.8-acre irrigated turf polo field portion of the equestrian facility (Lot 51) would require approximately 32.0 acre-feet per year of irrigation depending upon the specific type of turf selected for the field and the efficiency of the irrigation system. It is the intention of Peaceful Valley Ranch, LLC, to restrict groundwater extraction to the 22.2 acre-feet per year of groundwater recharge induced by the development of the project. The project proposes to use groundwater only for irrigation of the turf areas of the equestrian facility (Lot 51). The project proposes to use water from OMWD to supplement ground water irrigation use for blending to reduce TDS concentration associated with the groundwater.

The Earth Tech report findings concerning water quality indicated the water to be adequate for irrigation. The report states both wells have 1,300 Total Dissolved Solids (TDS) and respective Sodium Adsorption Ratios (SAR) of 18 for well PV1 and 4.1 for well PV2. The combination of TDS and SAR are used to gauge the quality of the water for irrigation. Well PV-1 is classified to be medium sodium (alkali) hazard- high salinity hazard (C3-S2) and well PV-2, low sodium (alkali) hazard- high salinity hazard (C3-S1). Subsequent testing by Wiedlin and Associates (2004 and 2005) found that wells PV-3 and PV-4 also contained relatively high levels of TDS ranging from 736-1,120 mg/l for well PV-3 and 1,000 to 1,080 mg/l for PV-4.

Wiedlin & Associates also analyzed nitrate mass loading from the proposed septic/leach systems on ground water nitrate concentration per the requirements of the San Diego County Department of Environmental Health (DEH). The study concludes NO_3^- concentrations of 12 mg/l for well PV-1, which exceeds the 10mg/l Regional Water Quality Control Board (RWQCB) standard set for the area. Nitrate concentrations at this level have no impact on agricultural operations. The Wiedlin & Associates report identified the organic farm as the likely source of high nitrate concentrations in the groundwater sampled in the immediate vicinity of the organic farm.

Therefore, based on the conclusions of the above studies and the irrigation history associated with the previous organic farm, it is concluded that the site has an adequate quantity and quality of water for agricultural enterprises to occur. In terms of potential agricultural use on the proposed residential parcels, OMWD water will be the water source for residences, therefore agricultural water supply on the proposed residential parcels will not be limited by the potential groundwater limitations discussed above. In terms of the proposed equestrian project components the groundwater resources at the site, supplemented with OMWD water can support the proposed project operations.

Environmental Hazards

At the time of inspection by the author of this report, other than any hazard associated with the accumulation of abandoned machinery and some soil discoloration at

the PV-1 well and booster site, no obvious environmental hazards were observed. In as much as the truck crop operation is organic, the use of restricted agricultural materials is not likely. The use of un-restricted agricultural materials and petroleum products such as fuels, lubricants, solvents, weed oils, dormant sprays or chemical carrier bases are routinely used, and frequently stored. If misuses, spillage, leakage or improper storage of any of these materials occur, an environmental hazard may be created.

A limited Phase I Environmental Site Assessment (ESA) of the subject site was performed by RBF Consulting in January 2003. A subsequent Site Reconnaissance was conducted by Kleinfelder Associates in March 2003 to investigate the area of the purported underground storage tank. The results of that investigation were discussed in a letter report prepared by Kleinfelder Associates addressed to Mr. Alex Jewell of RBF Consulting dated May 15, 2003. In June 2006, Peaceful Valley Ranch submitted an Application for Assistance with the County of San Diego Department of Environmental Health (DEH), and has been enrolled under the Voluntary Assistance Program (VAP) of DEH for on-going review of environmental hazard remediation associated with the project and site. As a result of further testing and investigations pursuant to discussions with the VAP project manager, Kleinfelder Associates prepared Limited Environmental Assessment and Recommended Action Plan dated November 10, 2006. These environmental site assessments are included as Appendix B, provided under separate cover.

NATURAL RESOURCES

Where agriculture is developed beyond subsistence, the ability of a specific parcel of land to be utilized for production agriculture is dependent upon the inter-relationship of available or obtainable natural and economic resources. In order to understand the agricultural potential of this parcel, these relationships must be cast into a complex matrix of land, labor, management, available capital, cash flow and profit.

Natural Resource Inventory

Climate. According to the University of California publication, "Climate of San Diego County Agricultural Relationships," the subject property is in the transitional area climate, which is inland from the maritime and coastal area climates. Direct ocean influence diminishes inland as the influence of the land surface increases. Such areas may experience coastal conditions from a day to a week or longer. Interior conditions may prevail for similar periods, or conditions may be strictly intermediate between the Coastal and Interior areas. The climate is mild although frost occurs due to the low lying topography. In most years severe frost is rare due to the moving air currents.

The annual mean temperature is 60 degrees, the mean maximum is 85 degrees, and the mean minimum is 40 degrees for the Jamul area. The growing season, that is the number of days between 32 degree days and nights is 300 days (February 4 - December 1); between 28 degrees days and nights is 350 (January 28 - December 14).

Annual rainfall is considered to be 15 inches with nearly 80 percent occurring in the months of December through March. The Potential Evapotranspiration (PET) is estimated to be 28 inches for the 300 day growing season. The annual PET is 30 inches. The climate affords a mild climate with sufficient chill for certain specialty crops.

Soils and Topography. About 74 percent of the soils on the site are inferior (Class IV through Class VII). The Class Soils II and III soils that make the remainder are disbursed in the more level, lower lying swales and benches (Table 1). The majority of these soils are within the more gentle portions of the eastern half of the subject and include the farmstead, pasture and farm area. The portion classified as unique Farmland is in two locations, one generally the farmstead and farm area, the other along the foot slopes and water course in the northerly portion.

The topography is mostly undulating (3% to 8% slopes) on which the better quality soils are deposited, to hilly (16% to 30%) steep. The highest elevation is approximately 1,028 feet amsl in the northeastern portion of the site. The lowest elevation is approximately 828 ft amsl on Lot 50 along the intermittent stream. The most level portions of the site are along the alluvial plain of the water course that meanders

from north to south of the site toward the west of the northerly portion and exiting toward the center of the southerly boundary. Both because 74% of the soils are inferior and because of the undulating character of the topography, soils and topography are the principal constraint to developing this site entirely in agriculture. These limitations are consistent with the area and neighborhood that has long been known as a grazing area, with some dryland farming interspersed with the irrigated garden and small truck farming operations.

For equine purposes, neither soils nor topography should prove to be a limitation.

Table 1. Soils Summary

Map Symbol	Name	Capability Class	Approx. Acreage	Percent Distribution
CmE2	Cieneba rocky coarse sandy loam, 9-30% slopes	VIIIs-8	16.37	9.0%
FaD2	Fallbrook sandy loam, 9-15% slopes, eroded	IVe-1	80.78	44.5%
FaE2	Fallbrook sandy loam, 15-30% slopes, eroded	VIe-1	19.87	10.9%
FeE2	Fallbrook rocky sandy loam, 9-30% slopes, eroded	VIe-7	7.42	4.1%
PeD2	Placentia sandy loam, 9-15% slopes, eroded	IVe-3	0.18	0.1%
RaB	Ramona sandy loam, 2-5% slopes	Ile-1	27.76	15.3%
RaC2	Ramona sandy loam, 5-9% slopes, eroded	IIIe-1	19.5	10.7%
Tub	Tujunga sand, 0-5% slopes	IVs-4	6.77	3.7%
VvE	Vista rocky coarse sandy loam, 15-30% slopes	VIe-7	2.91	1.6%
			181.56	100.00%
Totals by Capability Class				
Class II			27.76	15.29%
Class III			19.5	10.74%
Class IV			87.73	48.32%
Class VI			30.2	16.63%
Class VII			16.37	9.02%
			181.56	100.00%

Source: Soil Survey San Diego Area, California, USDA SCS et al., 1973.
Pacific Consultants

Capability Groupings. The capability grouping shows, in a general way, the suitability of soils for most kinds of field groups. The groups are made according to the limitations of the soils when used for field crops, the risk of damage when they are used, and the way they respond to treatment. The grouping does not take into account major and generally expensive land-forming that would change slope, depth, or other characteristics of the soils; does not take into consideration possible but unlikely major

reclamation projects; and does not apply to rice, cranberries, horticultural crops, and or other crops requiring special management. Capability classification is not a substitute for interpretations designed to show suitability and limitations of groups of soils for range, for forest trees, or for engineering.

In the capability system, all kinds of soils are grouped at three levels, the capability class, the subclass, and the unit. A survey area may not have soils of all classes. Capability classes, the broadest group of the three levels, are designated by Roman numerals I through VIII. The numerals indicate progressively greater limitations and narrower choices for practical use, defined as follows:

- Class I soils have few limitations that restrict their use.
- Class II soils have moderate limitations that reduce the choice of plants, or that require special conservation practices, or both.
- Class III soils have severe limitations that reduce the choice of plants, require special conservation practices, or both.
- Class IV soils have severe limitations that reduce the choice of plants, require very careful management or both.
- Class V soils are not likely to erode but have other limitations, impractical to remove, that limit their use largely to pasture, range, woodland or wildlife habitat.
- Class VI soils have severe limitations that make them generally unsuited to cultivation and limit their use largely to pasture, range, woodland, or wildlife habitat.
- Class VII soils have very severe limitations that make them unsuited to cultivation and restrict their use largely to pasture, range, woodland, or wildlife habitat.
- Class VIII soils and land forms have limitations that preclude their use for commercial crop production and restrict their use to recreation, wildlife, water supply, or to aesthetic purposes.

According to the Soil Survey Part III (soil interpretation manual) prepared by the San Diego County Planning Department with USDA Soil Conservation Service, the soils onsite are suitable for various crops. FaD2 soils occupy 42.5 % of the site and are rated as fair for avocados, however for the fair rating the soils would need to be ripped to improve permeability. The FaD2 soils are also rated fair for citrus, tomatoes and flowers, however the following properties adversely affect crop suitability: permeability rate, texture and slope limitations, respectively. RaB soils are rated as fair for citrus and truck crops with permeability rate adversely affecting production. The RaB soils, which occupy 15.3% of the site, are rated as fair for tomatoes with texture adversely affecting production and are rated as good for flowers.

California Resources Agency Important Farmland Mapping

The Important Farmland Mapping Categories Map promulgated by the California Resources Agency under the Farmland Mapping and Monitoring Program is shown for the project site and surrounding area in Figure 5. A review of the portion of the map that pertains to the subject indicates that about 18.5 acres in two locations are designated “*Unique Farmland*”. The California Resources Agency provides the following definitions for the farmland mapping categories that apply to the project site:

“Unique Farmland” is defined as “Lesser quality soils used for the production of the state’s leading agricultural crops. The land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the two update cycles prior to the mapping date.”

“*Unique farmland*” is further defined within *A Guide to the Farmland Mapping and Monitoring Program, Appendix B: Mapping Categories and Soil Taxonomy Terms*, from the California Department of Conservation Farmland Mapping and Monitoring Program, as:

“Unique Farmland is land which does not meet the criteria for Prime Farmland or Farmland of Statewide Importance, that has been used for

the production of specific high economic value crops at some time during the two update cycles prior to the mapping date. It has a special combination of soil quality, location, growing season and moisture supply needed to produce sustained high quality and/or high yields of a specific crop when treated and managed according to current farming methods. Examples of such crops may include oranges, olives, avocados, rice, grapes, and cut flowers. It does not include publicly owned lands for which there is an adopted policy preventing agricultural use."

The area of the site designated as Unique Farmland according to the Farmland Mapping and Monitoring Program maps, covers areas that were previously used for dryland farming. Dryland farming and grazing lands clearly do not meet the Unique Farmland definition because they are not high value crops.

"*Farmland of Local Importance*," is defined as Land of importance to the local agricultural economy, as determined by each county's board of supervisors and a local advisory committee. The San Diego County definition of farmland of local importance is:

"Land that meets all the characteristics of Prime and Statewide, with the exception of irrigation. Farmlands not covered by the above categories but are of significant economic importance to the county. They have a history of good production for locally adapted crops. The soils are grouped in types that are suited for truck crops (such as tomatoes, strawberries, cucumbers, potatoes, celery, squash, romaine lettuce, and cauliflower) and soils suited for orchard crops (avocados and citrus)."

Table 2A that follows tabulates the farmland mapping categories for the site based on the Important Farmland Mapping Categories Map. Based on the State's mapping, the project site contains approximately 115 acres designated as "Farmland of Local Importance" and approximately 18.5 acres designated as "Unique Farmland." However, all of the lands falling under these two categories are lands that either have historically

been left undisturbed or have historically been used for grazing, with the exception of the 2.5-acre area previously cultivated by the organic farm. Based on a field visit to the site, a review of historic agricultural activities on the site, and the State's definition of "Farmlands", all of the site would fall under either the "Grazing Land" category or the "Other Land" category, with only the 2.5 acre cultivated area of the former organic farm qualifying for the "Farmland of Local Importance" category. Table 2B tabulates the Farmland categories for the site based on the category definitions and historic agricultural use. As shown in Table 2B, most of the site is properly categorized as "Grazing Land" based on the State's definition of grazing land. No irrigation has been used on the site (except for the organic farm) and the site has been used as dryland farm crops. The 2.5-acre cultivated and irrigated area of the former organic farm is properly categorized in Table 2B as "Farmland of local Importance." The updated Farmland designations are shown in Figure 6.

Differences in land use and designations are to be expected. It is important to recall that the land designations of the California Resource Agency are intended to monitor farmland trends and have never been intended to be site specific.

Therefore, based on the review of the State Important Farmland Maps, historical aerial photos and onsite interviews, it has been determined that the accurate Farmland designations for the site are "Grazing Lands" and "Farmland of Local Importance" for areas that were used for grazing/dryland farming and for the cultivated area that was used as an organic farm, respectively.

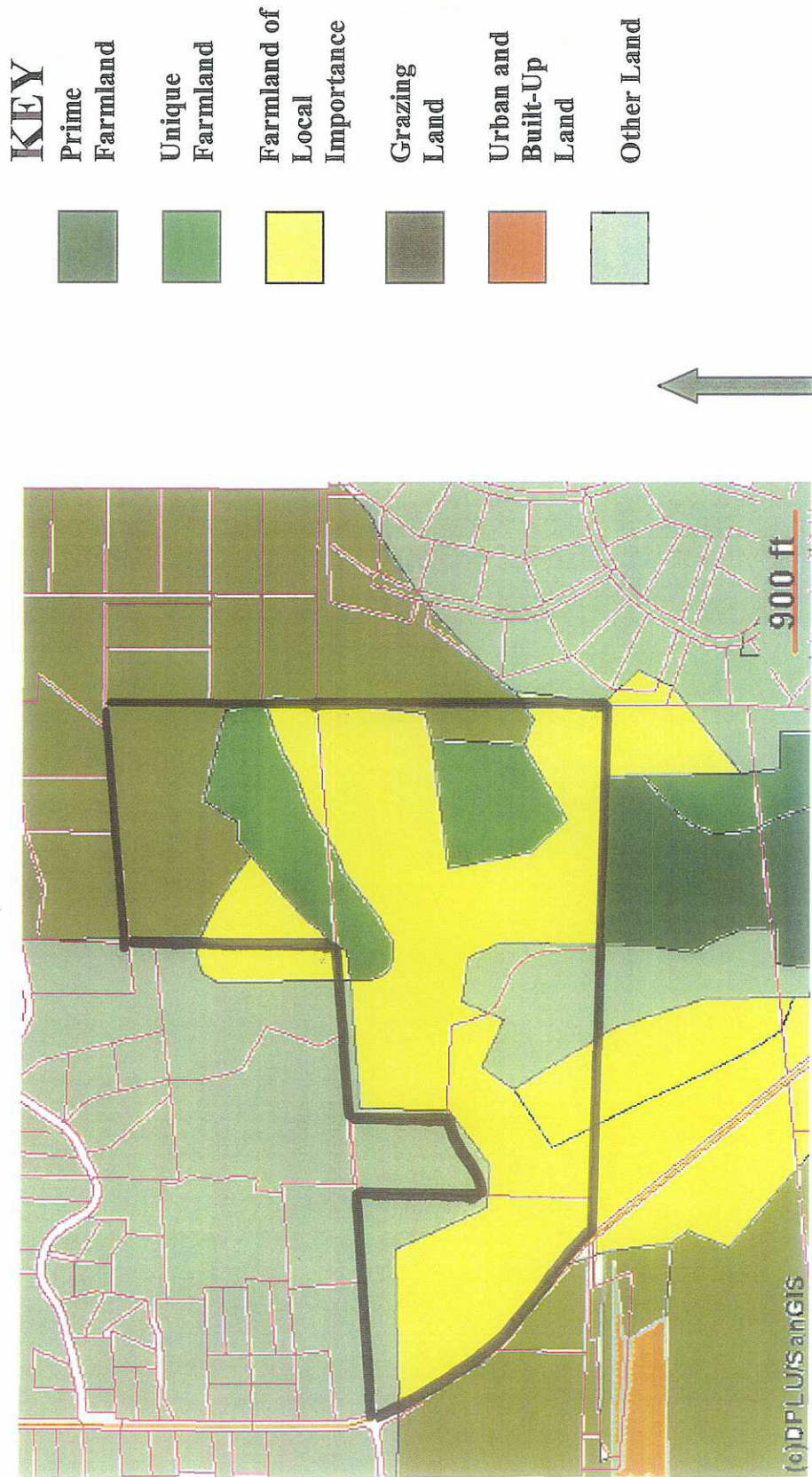
**Table 2A. Farmland Mapping Categories
Per CRA Important Farmland Mapping**

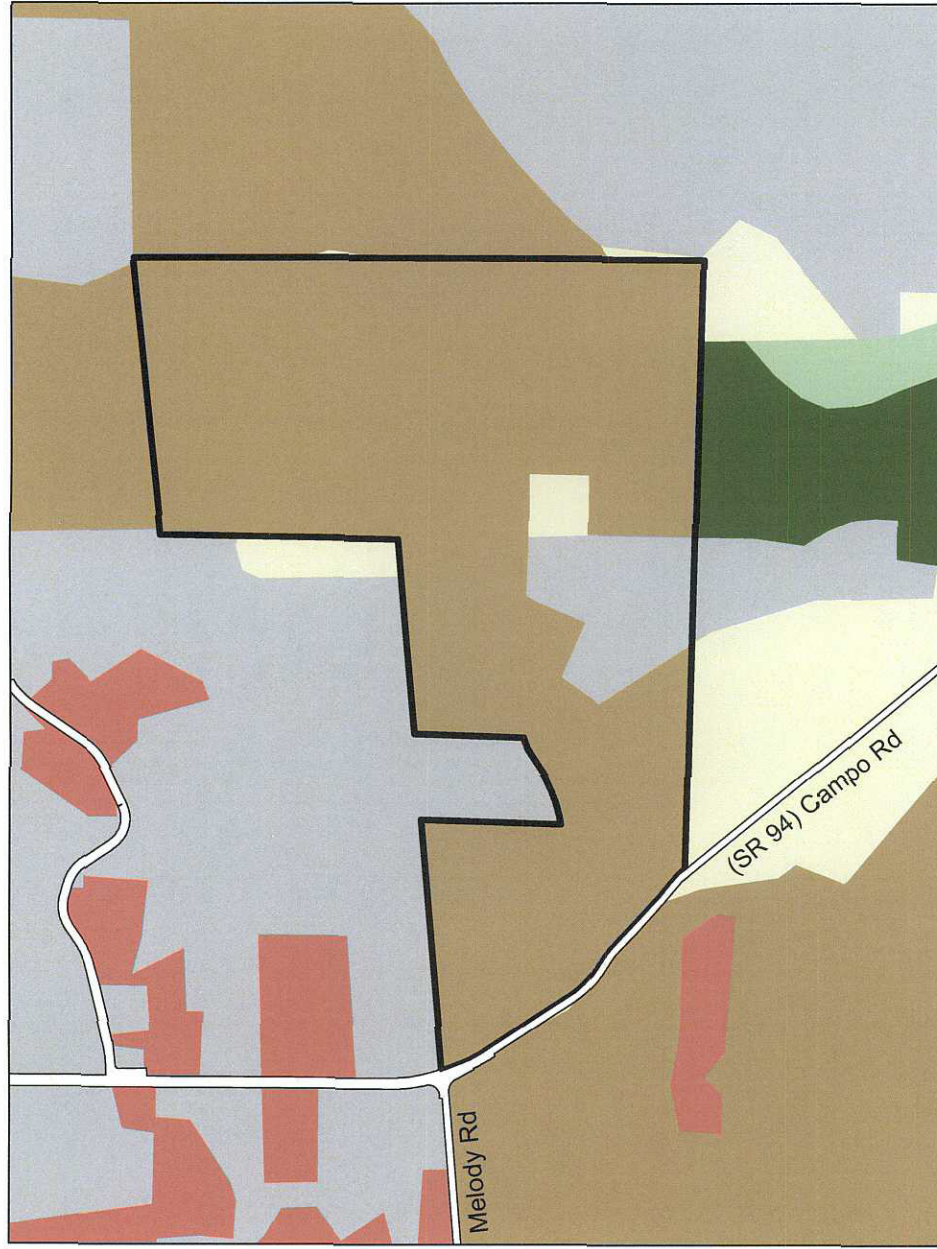
Important Farmland	Acres	Percent
Total Prime Farmland	0	0.00%
Total Unique Farmland	18.47	10.17%
Total Farmland of Local Importance	114.98	63.33%
Total Grazing Land	33.23	18.30%
Other Land	14.63	8.20%
<i>Totals</i>	<i>181.31</i>	<i>100.00%</i>

**Table 2B. Farmland Mapping Categories
Per Category Definitions And Historic Use**

Important Farmland	Acres	Percent
Total Prime Farmland	0	0.00%
Total Unique Farmland	0	0.00%
Total Farmland of Local Importance	2.50	1.38%
Total Grazing Land	164.18	90.55%
Other Land	14.63	8.07%
<i>Totals</i>	<i>181.31</i>	<i>100.00%</i>

SAN DIEGO IMPORTANT FARMLAND 2000 PEACEFUL VALLEY RANCH





Legend

- Prime Farmland
- Farmland of Statewide Importance
- Unique Farmland
- Farmland of Local Importance
- Grazing Land
- Urban and Built-Up Land
- Other Land

Important Farmland Mapping Categories - Historic Uses and Environmental Constraints

Peaceful Valley Ranch Agricultural Study



Not to Scale

RBF
CONSULTING
25100831/831.0x034 historic farmland.ai

Figure 6

Interpretation of Natural Resources

Historic use in the area has been grazing and dryland farming in addition to a small organic farm. The area has not been used for permanent plantings due to the combination of water availability, soils and climate. The natural resource inventory of the subject reveals a mix of soils and topography consistent with that of the area. With the abandonment of a previous cucumber farm on the Daley Ranch property to the south of Peaceful Valley Ranch and abandonment of the organic farm onsite, intensive farming in the area has ceased. Twenty-six percent of the soils on the subject are suitable for a number of crops. These and the remaining, lesser quality soils have been adapted to dry farming. In addition to the fragile, poor quality of the preponderance of soils, the reason for this is explained mostly by its topography, which renders extensive irrigation impractical. While small-scale irrigation was feasible for the previous organic farm, extensive irrigation for row type crops covering a larger portion of the site is limited due to topography. The undulating and hilly topography is a significant limitation when selecting commercially viable crops.

ECONOMIC RESOURCE

The economic resources associated with the subject are typical of others in eastern San Diego County. The site enjoys Interstate access via State Route 94 and improved secondary roads. Water, power and telephone are available, as well as fire and police protection. Sufficient religious, medical, educational and recreational facilities are available.

Economic Resource Inventory

Three economic resources adversely affect the agricultural use of the site, two are structural and one is systemic.

The structural influence that in large part defines San Diego County agriculture is the impact of water cost and availability. The historic and current cost of water provided by Otay Municipal Water District is among the highest in the county. Therefore the use of district water when it becomes available is economically constrained.

The second influence is the industrialization of the acquisition and distribution of perishable agricultural products worldwide. Within the last 5 years, this trend has accelerated as retail distribution has consolidated into a near worldwide oligopoly.

The third adverse significant economic resource is affordable housing. This is a regional problem, systemic to the conflicts of competing interests present in the land use decision process. While affecting all economic activity, the lack of housing is reaching near crisis proportions in agriculture. The inability of farm workers and their families to obtain safe, affordable housing is rapidly placing County agriculture at a serious disadvantage with its competitors in other areas.

Interpretation of Economic Resources

The economic constraints discussed above are a reality for large-scale farmers who produce agricultural products for wholesale markets. These farmers rely on agricultural income for their livelihood and must recoup investments and gain adequate return to continue operations. Small-scale operations are not as affected by these global forces because in general they are targeting different markets and have different overall goals. Economic constraints associated with small-scale production are reduced. Homeowners will not generally need to rely on agricultural revenue for survival, therefore they can make the investment in irrigation and water costs feasibly. Homeowners often place an aesthetic value on the scenery and rural “feel” that an agricultural field or orchard elicits. In San Diego County, small-scale agricultural operations on developed parcels are common. The proposed project density will create residential parcels that are large enough to support agriculture, consistent with the prevalence of small farms throughout the County.

The proposed equine operations will be less affected by the economic factors discussed above than producers of food, fiber and nursery products because of greater profit margins and lesser direct competition at the global scale. The structure of the industry and its high value products typically provide sufficient margins to overcome constraints that could be fatal to enterprises producing into lower value markets. The

equine industry is subject to the same cost and infrastructure constraints as others in agriculture, but is generally better able to mitigate their impacts.

When cast in the context of natural and economic resources available to the enterprise, the use of the site for equitation is an appropriate use within the San Diego area.

THRESHOLDS OF SIGNIFICANCE

Significance guidelines to define significant impacts to agricultural resources have been established. The guidelines were established in conjunction with Appendix G of the CEQA Guidelines and the County of San Diego's adopted ordinances and policies to ensure the guidelines are accurate and effective tools in determining impacts to agricultural resources. Exceeding the following thresholds would be considered substantial evidence that a significant impact on agricultural resources would occur as a result of project implementation:

- I. The project would result in Land Evaluation and Site Assessment (LESA) Model total scores greater than or equal to 40 points with sub-scores for Land Evaluation (LE) and Site Assessment (SA) that are each greater than or equal to 20 points, as indicated by the LESA Scoring Table, below.

LESA Scoring

<i>Total LESA Score</i>	<i>Scoring Decision</i>
0 to 39 Points	Not considered significant
40 to 59 Points	Considered significant only if LE and SA subscores are each greater than or equal to 20 points
60 to 79 Points	Considered significant unless either LE or SA subscores are less than 20 points
80 to 100 Points	Considered significant

- II. The project would conflict with permitted uses on land subject to a Williamson Act contract.
- III. The project would result in changes to the existing environment, which, due to their location or nature, could result in the conversion of Farmland to a non-agricultural use.

- IV. The project would conflict with the County's General Plan agricultural policies listed in its Land Use Element, Conservation Element, or Open Space Element, or in the *Jamul-Dulzura Subregional Plan*.
- V. The project would create a conflict with permitted uses on agriculturally zoned land.
- VI. The project has impacts that are individually limited, but cumulatively considerable ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).

ANALYSIS OF PROJECT EFFECTS AND SIGNIFICANCE DETERMINATION

Direct Impacts

California Land Evaluation And Site Assessment Model Analysis

Neither the California Environmental Quality Act nor The State of California have set forth specific guidelines concerning how agencies should address farmland conversion impacts on projects. The only specific mention is a reference to the effect that a project will *normally* have significant effect on the environment if it will *convert prime agricultural land to non-agricultural use or impair the agricultural productivity of prime agricultural land*.¹ However, in 1993, Senate Bill 850 charged the State Resource Agency "to provide lead agencies with an optional methodology to ensure that significant effects on the environment of agricultural land conservation are quantitatively and consistently considered in the environmental review process." The point-based Land Evaluation and Site Assessment (LESA) system is the result.

The LESA model defines and measures two separate sets of factors. The first, land evaluation, includes measuring the inherent quality, suitability and adaptability of a

¹ 1997, *California Agricultural Land Evaluation Site Assessment Model Instruction Manual*, California Department of Conservation, Office of Land Conservation. Sacramento, CA: *and Occupiers*

site's soils. The second, site assessment, includes factors that are intended to measure social, economic and geographic attributes that also contribute to the overall value of land devoted to agriculture. Each factor is scored using a numerical value, and then is weighted to consider its relative contribution for a specific site. The subject site is evaluated and assessed using the LESA model pursuant to the California LESA Model Instruction Manual. The result of the LESA model analysis for the proposed project is a total overall score of 36. This score is less than the score of 40, which is the threshold for a site to be of agricultural significance.

The land evaluation (LE) uses two USDA measures, soil capability classification, which is a means of assessing the capability of a soil using customary management practices, and the *Storie Index* which classifies a particular soil utility for crop production, based solely on its physical composition. Each soil on the site is assigned a qualitative value based on its capability class and Storie Index number, with an individual soil's proportional value contributing to a composite score, which is representative of the overall agricultural worth of the soils on the site. The application of this process is found on Table 1, Soils Identification, Distribution and Evaluation in Appendix C.

The site assessment (SA) is intended to place a particular project into a relative context within its proximal area. Four elements of the site are measured using a mandated point system.

The impact of project size is assessed as Item 1 of the site analysis by assigning a value based on the amount and quality of the soils within a project. The greater the quality of a soil, the fewer acres required to receive a high point value. For example, a site with a loss of more than 80 acres of Class I or II soils is assigned the maximum point value of 100, where a loss of 320 acres of Class IV land would be necessary for a site to score the maximum 100 points. The application of this process for this analysis is found as Item 1, Table 2, Site Assessment in Appendix C.

Item 2 of the site analysis is water resource availability. Water resource availability on the site is scored from 12 options. A means of measuring water availability and reliability for a particular site is significant in two ways. First, the

capability classifications consider customary management, which in most areas of California includes irrigation. Second, no matter what the quality of soils, the ultimate value of a site as an agricultural production resource is dependent upon the availability of sufficient irrigation water, of sufficient quality, at a cost commensurate with the value of the crop being produced. The water availability score assigns a value using three criteria. Those criteria are: a) if irrigated production is feasible; b) if there are physical restrictions; and c) if there are economic restrictions. These three criteria are considered in both non-drought and drought years and are applied to the number of acres under cultivation. The application of this process for this analysis is found as Item 2, Table 2, Site Assessment in Appendix C.

Item 3 of the site analysis table measures the impact of a project on the neighboring agricultural activity of the site. The more agricultural activity in an area, the higher the score. This analysis recognizes that placing a non-agricultural use within an agricultural area is often adverse to existing farming as well as it may hasten premature conversion of farmland to other uses. Application of this process requires that the land use within one-quarter mile be inventoried and quantified by use. For this analysis, these data may be found as a part of Appendix C as Zone of Influence Inventory.

Item 4 of the site analysis table is similar to item 3, but focuses on agriculturally protected lands, recognizing that a project may be adverse to the intended use and function of such protected lands. These lands are included as part of the inventory and quantification of land within the Zone of Influence found in Appendix C and on Figure 2. Aerial Photograph.

When the project is scored using the four Site Assessment items, each is given a weighting of 0.15 to arrive at the total site assessment score found in Table 3 LESA Final Score Summary, which presents the sites final score for both land evaluation and site assessment using LESA criteria.

Table 3. LESA Final Score Summary

FACTOR NAME		RATING (0-100 points)	X	FACTOR	WEIGHTED SCORE
LAND EVALUATION (LE)		(from Table 1)			
1	Land Capability Classification	49.3		0.25	12
2	Storie Index Rating	46.5		0.25	12
Total Land Evaluation Score				0.50	24
SITE ASSESSMENT (SA)		(from Table 2)			
1	Project Size	40		0.15	6
2	Water Resource Availability	38		0.15	6
3	Surrounding Agricultural Lands	0		0.15	0
4	Protected Resource Lands	0		0.05	0
				0.50	12
TOTAL LESA SCORE					36
LESA MODEL CEQA THRESHOLDS					
0 - 39 Points		Not considered significant			
40 - 59 Points		Significant only if LE and SA subscores are each greater than or = to 20 points.			
60 - 79 Points		Significant unless either LE or SA subscores is less than 20 points.			
80 -100 Points		Significant			

Based on the result of the LESA model, the site is not considered a significant agricultural resource because it does not meet the significance criteria of having a minimum score of 40. Furthermore, because the project incorporates an equine component and proposes residential parcels that are large enough to support future small-scale agricultural operations, the site will remain available for agricultural use. Based on the above, it is determined that the project will have no significant direct impact to agricultural resources.

Farmland Classifications Analysis

The proposed project would directly impact approximately 164 acres of "Grazing Land" and 2.5 acres of "Farmland of Local Importance" as these categories are defined by the California Resource Agency and the County, and based on the historic agricultural uses on the site and environmental constraints to agriculture (Table 2B). Inasmuch as the site is not considered a significant agricultural resource, based on the result of the LESA model, the direct impacts to the Grazing Land and Farmland of Local Importance

categories are not considered a significant impact. Furthermore, because the project incorporates an equine component and proposes residential parcels that are large enough to support future small-scale agricultural operations, the site will remain available for agricultural use. Based on the significance criteria for the impacts to designated Farmland, the project will not convert any farmland designated as Prime Farmland or Farmland of Statewide Importance when properly classified. Approximately 2.5 acres of the site is classified as Farmland of Local Importance. However, since this acreage amounts to less than 0.0023% of the 108,580 acres of existing countywide Farmland of Local Importance as reported in the California Farmland Conversion Report 2000-2002, the conversion of such acreage to another use is not considered a significant impact, particularly when the area will be retained in an equine breeding and boarding use. Therefore, the project will not have significant direct impacts to agricultural resources relating to the conservation of significant Farmlands as classified.

Economic Analysis

To measure the economic impact on regional agricultural revenue, the following Table 4 summarizing the historic agricultural revenue produced from the subject parcel is provided.

Mr. Benson reported Good Faith Organic Farm had sales of \$200,000 per year. While the farm has ceased operations on the project site, the Good Faith Organic Farm has since moved operations to another location in the County of San Diego; therefore, there is no net loss of agricultural revenue in the county as a result of the project.

The dryland farming operation is estimated to contribute about \$9,200 per year of the \$427,000 county field crop sales. The loss of dryland farming revenue is not considered significant due to the low overall value of production and high availability of replacement lands for dryland farming.

The Peaceful Valley Ranch Horse Boarding, Breeding and Training Agribusiness study, by Dennis Moser of Moser Ventures and Jocelyn Parker, a copy of which is

included as Appendix D, projects sales from \$200,000 to \$400,000 in addition to revenues derived from boarding and trading.

The Moser and Parker study projects sales of 10 trained polo ponies at a gross value of between \$20,000 to \$40,000 each. These values are not unreasonable for quality horses. If these values were to average 50% less, there should be enough opportunity from breeding or trading to offset the shortfall, if any, when the operation is established.

Table 4. Historic Agricultural Revenue

Vegetable Crops				
Year	Countywide Acres	Countywide Value	Share of Total County Agriculture	
2002	7,365	\$101,324,575	7.81%	
2001	9,240	\$111,621,875	8.65%	
2000	8,036	\$129,159,542	10.30%	
1999	13,331	\$132,200,537	10.69%	
1998	12,563	\$128,472,996	10.90%	
Average	10,107	\$120,555,905		
Most Recent 3 years Average	8,214	\$114,035,331	8.92%	
Good Faith Organic Farm Contribution				
	Sales	\$200,000		
	Market Share	0.18%	0.0156%	
Field Crops - Oat Hay				
Countywide Acres	Tons/Acre	Total Yield (Tons)	Price/Ton	Total Sales
5,100-ac	1.0	4,896	\$ 55.24	\$ 270,455
5,200-ac	2.3	11,856	\$ 53.56	\$ 635,007
3,285-ac	2.2	7,063	\$ 53.06	\$ 374,752
3,750-ac	2.2	8,250	\$ 52.81	\$ 435,683
4,600-ac	2.1	9,660	\$ 52.05	\$ 502,803
Avg. 4,387-ac	1.9	8,345	\$ 53.17	\$ 443,740
Peaceful Valley Ranch Contribution				
90-ac	1.9	171	\$ 53.17	\$ 9,092
				2.05%

Regarding the Peaceful Valley projections, it is useful to review some key horse industry statistics published by The American Horse Council Foundation.

According to the study, the industry's contribution to the U.S. Gross Domestic Product is greater than the motion picture services, railroad transportation, furniture and

fixtures manufacturing and tobacco product manufacturing industries. It is only slightly smaller than the apparel and other textile industry. The study reports 6.9 million horses in the U.S. Of these, 725,000 are involved in racing and horse race breeding; 1,974,000 and 2,970,000 for showing and recreation; with 1,2762,800 for other uses such as farm and ranch work, rodeo, police and other uses. The direct economic effect is 25.3 billion dollars.

The Council's study places the industry's contribution to the state's economy at \$3.4 billion, with an estimated 750,000 Californians direct participants in the industry as owners, service providers, employees and volunteers. The report concludes that the industry employs 36,000 full time and generates an additional 88,400 for total employment of 124,400.

According to the report, there are 642,000 horses in California, 70% of which are involved in showing or recreation. California has about 16% of the nation's race horses. In addition to Del Mar, California has four other racetracks with long seasons, one racetrack with a medium-length season and nine fairgrounds with short seasons. When the study was conducted, two of the 40 largest horse shows were held in California.

The California Thoroughbred Breeders Association (CTBA) has identified San Diego County as one of the five most important in the state with a significant statewide concentration of Thoroughbred horse farms.² Using the CTBA classification to apportion the industry's contribution to the state's economy of \$3.4 billion, it may be inferred that the economic impact of the horse industry on San Diego County is \$0.68± billion annually.

This analysis concludes that the project does not result in a significant economic loss to the County's agricultural business as a result of the conversion of designated Farmlands to a non-agricultural use. Therefore, potential impacts associated with conversion of designated Farmlands are considered to be less than significant.

Agricultural Preserves And Williamson Act Contracts Analysis

With respect to agricultural preserves, the site itself not encumbered by a “Land Conservation Agreement” (Williamson Act Contract) is not within an Agricultural Preserve; nor is it within the Agricultural Preserve or Intensive Agriculture land use designations within the County General Plan.

With respect to surrounding properties, it should be noted that County tax records continue to show that the land to the south of the project site, The Hollenbeck Canyon Wildlife Area (formerly Rancho Jamul), is within an agricultural preserve, and under a Land Conservation Agreement. While this was the case when privately owned, when the property was acquired by the State of California, the contract became null and void insofar as an agricultural preserve contract can only be executed and enforced between a public taxing agency and a private landowner. Additionally, inasmuch as the Rancho Jamul property was acquired by the state for open space and habitat preservation purposes, any further use of that land for dryland farming or row crop production would be contra to that intended use and is no longer done.

There are no other properties under agricultural preserve agreements that surround the subject site.

Based on the fact that the subject property is not within an agricultural preserve, nor within the Agricultural Preserve or Intensive Agricultural land use designations within the County General Plan, nor encumbered by any Williamson Act Contract, and potential impacts with the conversion of agricultural uses to non-agricultural uses with respect to Williamson Act contracts or agricultural preserves is considered less than significant.

Compatibility With Surrounding Land Uses

A review of the existing land uses of surrounding properties has also been made in connection with this report. The review is based upon an inventory following the criteria of the California Land Evaluation and Assessment Model applied to aerial photos obtained from REDI @ sandag/sangis 2004 and RBF Consulting.

The aerial photograph, Figure 2 is provided in order to cast the situs into relationship with existing land uses. A review of this photo is instructional in assessing prevailing land use and parcel size.

The following table summarizes the inventory of surrounding land uses.

Table 5. Zone of Influence - Parcels By Use, Frequency and Size

	frequency	% frequency	size range		mode	mean	mean less high/low
			largest	smallest			
1 house w/groves/fields	1	0.5%	20.90	20.90	NA	NA	NA
2 vacant	1	0.5%	86.03	86.03	NA	NA	NA
2a vacant commercial	3	1.6%	1.30	0.06	NA	0.85	NA
3 greenhouse/nursery	1	0.5%	24.75	24.75	NA	NA	NA
4 fields	2	1.1%	142.40	18.83	NA	80.62	NA
5 single family residence	124	68.1%	24.75	0.20	1.00	2.79	2.63
6 commercial, etc.	5	2.7%	1.81	0.87	0.87	1.13	1.00
7 rural residences	5	2.7%	42.65	8.00	NA	16.16	10.04
8 schools/public	2	1.1%	7.82	0.84	NA	4.33	NA
9 intensive ag	0	0.0%	0.00	0.00	0.00	0.00	0.00
10 equine	0	0.0%	0.00	0.00	0.00	0.00	0.00
11 cemetery	1	0.5%	1.54	1.54	NA	NA	NA
12 State Owned Preserve	6	3.3%	466.17	54.94	NA	146.10	88.87
13 USA/BIA	2	1.1%	4.66	4.35	NA	4.51	NA
14 vacant s.f.r.	26	14.3%	19.01	1.00	5.00	4.98	4.56
15 open space	4	2.2%	20.15	1.00	NA	10.78	10.99
	183	100.0%			1.00 ¹	9.82 ¹	7.39 ¹
% land in agriculture production		2%					
% land vacant or non-agricultural		98%					
State Preserve land		3.30%					

Note 1: Calculated using all land use data as the source rather than land use category as within the table.
Source: Pacific Consultants

Analysis of Potential Conflicts, Indirect and Fringe Impacts on Surrounding Agriculture

As can be seen from Table 5, the surrounding neighborhood is characterized by a preponderance of residential, rural residential and vacant residential, with State of California conservation land to the south and a small acreage of tribal land across Campo Road to the west from the site. Since the former cucumber operation to the south on the Rancho Jamul property has ceased operation, there are no agricultural activities of significance in the area other than the few remaining acres of dry farming, a recently

planted 15-acre citrus grove on a 20-acre parcel, and a 24.75-acre nursery noted in the table above.

The project design was reviewed to identify potential conflicts between the proposed residential and any surrounding agricultural land uses. The project as designed, includes a minimum of 100 feet of setback of residential structures or occupied facilities from the project boundary, except at Lots 45 and 46 where the setback from the project boundary is 30 feet. The 100-foot buffer as incorporated into the project design provides adequate distance between residential uses and any existing or future off-site cultivated areas or stables. With respect to Lots 45 and 46, the 30-foot on-site buffer to the project boundary is effectively increased by an additional 20-foot private roadway easement off-site and adjacent to the project boundary. Additionally, a tentative parcel map to subdivide the adjacent property for residential use (Blanco Subdivision) has been approved by the County; as such, no conflicts between the residential uses on Lots 45 and 46 with existing or future off-site cultivated areas or stables is anticipated.

The project as presented is therefore compatible with adjacent neighborhood activities and no significant conflicts, indirect or fringe impacts on surrounding agriculture uses are anticipated.

Notwithstanding, from time to time nearby agricultural activities may be expected to create actual or perceived inconveniences and irritations arising from routine operations and processes. Examples of the types of activities from which these might arise include cultivation, plowing, spraying, pruning, harvesting, drying, crop protection from the elements or depredation which generates dust, smoke, noise, insects, rodents and odor. The application and use of soil amendments and chemicals such as manure, organic and synthetic fertilizer, gypsum, mulch and planting materials, herbicides, insecticides, fungicides, miticide/thripicides, rodenticides or other crop protection compounds can be a source of odor, inconvenience or irritation as well. The transportation and presence of farm labor, and equipment can be noisy and increase the need for caution while traveling the more narrow country roads.

Therefore, in order to ensure that future residents of the proposed subdivision are aware of potential nuisances that may occur due to agricultural activity onsite and in the surrounding area, the project will be conditioned to require a disclosure to purchasers of property that there may be hazards or unusual conditions (such as dust, noise, farm workers, use of crop protection materials, etc.) in or near this subdivision related to surrounding agricultural uses. The disclosure will be made through the State of California, Department of Real Estate (DRE) in a Public Report ("White Paper"). The White Paper will disclose how the existence of area agriculture might affect the use and enjoyment of the property. The information to be included in the application for the Final Public Report shall be submitted to and approved by the Director of Planning and Land Use prior to submission to the DRE. San Diego County Code §63.404 *Notice to Prospective Buyers and Occupiers*³ provides the basis for this notice, which may include its language. Section 63.404, *Notice to Prospective Buyers and Occupiers*, (a) and (b), is included in Appendix E.

Analysis Of Potential Conflicts, Indirect and Fringe Impacts Of On-site Equine Uses On Surrounding Agriculture

No conflicts, indirect or fringe impacts are foreseen to arise on surrounding agriculture from the project, due to the consistent nature of the project with the existing surroundings. Offsite adjacent land users are not anticipated to be negatively impacted by potential adverse impacts associated with the equestrian uses, including potential dust, noise and odors, because the project design places the private equestrian facility / polo field internal to the subdivision with only one boundary adjacent to offsite property to the south, the Hollenbeck Canyon Wildlife Area, owned by the State of California; and, in addition, the public equestrian facility is proposed adjacent to Campo Road/SR94, with no other shared offsite boundaries.

November 1994.

³ San Diego County Code Regulatory Ordinances Title 6, Health And Sanitation Division 3. Crops And Plants, Section 63.404 (a) & (b) Notice to Prospective Buyers

Additionally, due to the nature of the agricultural activity contemplated on-site; i.e., equine uses, the use of agricultural chemicals will be limited. In the case of the stable area and polo grounds, the use of restricted materials is selective and guarded, with the most likely use limited to materials for fly and rodent control. The application of pest control materials is highly regulated with every effort taken for worker and public safety.

Therefore, it is determined that the project will not cause significant conflicts, indirect or fringe impacts to surrounding residential uses due to the proposed equine operations or changes in the existing environment.

Consistency With County General Plan Policies

County General Plan Land Use Element

The County of San Diego General Plan includes policies aimed at preserving land within specific agricultural designations in the unincorporated areas of San Diego County. These agricultural lands are designated either (19) Intensive Agriculture or (20) General Agriculture within the County General Plan. The project site has existing General Plan designations of (17) Estate Residential and (18) Multiple Rural Use. Under Policy 2.4 of the Regional Land Use Element of the County General Plan, the (17) Estate Residential and (18) Multiple Rural Use designations provide for both minor agricultural uses and low-density residential uses, but are not classified in the Land Use Element of the General Plan as an agricultural designation.

The proposed project would require an amendment to the County General Plan to reclassify the eastern 152.46 acres of the site from an (18) Multiple Rural Use Plan General Plan designation (1 du/4, 8, 20 ac) to a (17) Estate Residential General Plan designation (1 du/2, 4 ac). Refer to Figure 3 for the existing and proposed General Plan designations. The proposed General Plan Amendment will be consistent with the agricultural related policies of the County General Plan Land Use Element since those policies are directed at the (19) Intensive Agriculture and (20) General Agriculture land use designations rather than the (18) Multiple Rural land use designation.

County General Plan Conservation Element

The Conservation Element of the County General Plan also provides policies that connect soils to agricultural uses within the County of San Diego. In particular, Policy 2 of the Conservation Element states that the County will analyze, improve and promote methods for preserving agriculture. Inasmuch as the analysis required under Policy 2 has been completed herein, the site is not considered a significant agricultural resource based on the result of the LESA model, the site is not designated as agricultural lands under the County General Plan Land Use Element, and is not designated as an agricultural preserve nor encumbered with a Williamson Act contract, the proposed project is consistent with Policy 2 of the County General Plan Conservation Element.

County General Plan Open Space Element

The Open Space Element of the County General Plan contains a policy pursuant to Board of Supervisors Policy I-38 specifically establishing agricultural preserves in areas the Board of Supervisors has determined to be of agricultural significance and designated as either (19) Intensive Agriculture or (20) General Agriculture within the County General Plan Land Use Element. Inasmuch as the site is not considered a significant agricultural resource based on the result of the LESA model, the site is not designated as agricultural lands under the County General Plan Land Use Element, and is not designated as an agricultural preserve nor encumbered with a Williamson Act contract, the proposed project is consistent with Policy 2 of the County General Plan Open Space Element.

Jamul-Dulzura Subregional Plan

The project is also subject to applicable policies contained in the Jamul-Dulzura Subregional Plan, part of the San Diego County General Plan. The Jamul-Dulzura Subregional Plan contains Policies 8, 9 and 10, which are applicable to agricultural uses.

Policy 8: Agricultural activities are essential in maintaining the existing rural life of the community. Therefore, all agricultural activities, large or small, which provide a local or regional source of food/fiber/fuel will be encouraged where water and land resources are available.

Policy 8 encourages agricultural activities, large or small, and considers such activities essential in maintaining the existing rural lifestyle of the community. The project is determined to be in conformance with this policy due to the compatibility of the proposed equestrian facilities with agricultural uses and due to the Agricultural Zoning (A72 General Agriculture), which will require minimum two acre parcel sizes. The two-acre minimum parcel sizes for the residential development will be a density supportive of small-scale agricultural activities, in keeping with the rural life of the community. Thus, the proposed project is consistent with this policy.

Policy 9: A study of the long-range availability of groundwater for agricultural uses will be prepared as soon as possible.

A groundwater investigation was prepared for the PVR project, consistent with County standards for site-specific hydrogeological investigations. The analysis evaluated groundwater resources within the watershed, the projected groundwater demand of the project, and the groundwater recharge for the project area. Groundwater from an existing well on Lot 51 (PV Well No. 4) is proposed for use in irrigating the turf areas associated with the polo field and equestrian uses on Lot 51. The amount of groundwater to be extracted annually would be limited, so as not to exceed the calculated amount of annual groundwater recharge generated by the project. Imported water from OWD is proposed for use to supplement this groundwater source for irrigation use and blending to reduce TDS concentration in associated with the groundwater. The use of groundwater would be controlled and regulated by the County through the MUP to be issued by the County for the uses proposed for Lot 51. The project is therefore considered to be consistent with this policy.

Policy 10: Keeping animals and other agricultural land uses on residential parcels of one acre or larger is desirable. As land holdings increase in size, the number of animals permitted should also be increased. Land use regulations permissive enough to allow such agricultural uses are appropriate throughout the community.

The proposed GPA and Rezone of the PVR site would not change the existing animal schedule designator of the site. Currently, the PVR site is zoned with an "O"

animal designator, which permits horse-keeping and stable facilities. No restrictions and/or density limitations are provided with the “O” designator. The “O” designator allows unlimited horses with no density restrictions; therefore, the project is consistent with this policy. In addition, the proposed equestrian uses and facilities provide supporting infrastructure to encourage the keeping of animals.

Based on project compliance with the above, the project is found to be consistent with the agricultural policies contained in the Jamul-Dulzura Community Plan.

Potential Conflicts With Permitted Uses On Agriculturally Zoned Lands Analysis

The A72 zoning designation is intended to “create and preserve areas for the raising of crops and animals;” however, permitted uses within the zone include single-family residential use types. Consistent with the intent of the zone, the proposed public equestrian uses would be allowed by right on the subject property. In addition, the project includes operation of a private horse stable and polo training facility on Lot 51. Planned operations and uses include, among other activities, a limited number of anticipated polo events/matches, which events are classified as “Outdoor Participant Sports and Recreation” under the County’s Zoning Ordinance. Under the A72 zone, such events require a Major Use Permit, which is being applied for as part of the project. With the issuance of the Major Use Permit and incorporation of appropriate conditions related to project operations, the proposed equestrian uses are considered to be consistent with the County Zoning Ordinance and the A72 designation of the site. Therefore, potential conflicts with permitted uses on agriculturally zoned lands are considered less than significant.

CUMULATIVE IMPACTS

The first step in assessing cumulative impacts of the project is to define an area of study. The natural resources selected to define the study area are: watershed boundaries, topography, climate, and farmland categories, based on The Important Farmland Mapping Categories Map promulgated by the California Resources Agency under the Farmland Mapping and Monitoring Program.

The study area selected generally includes the majority of the watershed (refer to Figure 4.14-B).

To a significant extent, topography defines agricultural activity. The extent and steepness of slopes, the presence of arroyos and barrancas, planes and foot slopes each have an important role hindering or facilitating the physical agricultural use of a particular property. Topography also defines microclimates, i.e. temperature, precipitation, air pooling and drainage. Hazards associated with flooding, accumulation or pooling of water, wild fires and winds are influenced and often defined by topography and the lay of the land of a particular site in relation to the prevailing topographic features. The study area selected spans a topographic range of approximately 900 feet above mean sea level (amsl) in the westerly portion to approximately 1,500 feet amsl in the easterly portion. From north to south, the elevation of the study area generally ranges from approximately 860 feet amsl to 1,500 feet amsl. The topographic features used to define the area generally conform with those found on the subject.

The area climate zones are used as a third study area selection criteria. Perhaps more than any single natural resource, climate defines agricultural crop selection and farming success in San Diego County. It can truly be said that the Mediterranean climate is our most important resource. In the vicinity of the project site, the Coastal Climate Zone is identified at a distance to the west and south of the project site and the Interior Climate Zone is identified to the northeast. The project is located within the Transitional Area Climate. As the name implies, the Transitional Area Climate exhibits characteristics of both the Coastal and Interior Climatic Zones.

The final selection criteria are soils. Although soils are not the pivotal resource for agriculture in San Diego County, they are such an important resource that their value and protection are recognized as a community asset, in part giving rise to this and similar studies. As discussed earlier, the State of California has chosen to monitor the state's soils inventory, using the Important Farmland Mapping Categories Map as a guide. The list of projects is used to identify projects that are being developed on land designated Prime Farmland, Unique Farmland, Grazing Land or Farmland of Statewide Importance.

Using The Important Farmland Mapping Categories Map as it pertains to the study area, projects that will impact these categories can be identified and evaluated as to their past, current and prospective land use as a factor of agricultural production.

The second step is to select a method on which to base the assessment. For purposes of this study, the list of projects method is used to identify projects that may have a possible cumulative impact within the study area. The specific projects encompassed within this cumulative analysis are shown in Table 6. A comprehensive list of the cumulative projects and a graphic exhibit showing their locations is provided in Appendix F.

Of the 11 projects found to be within the cumulative impact study area, projects 8, 10, and 11 are found to contribute to possible significant cumulative agricultural impacts based upon either impacts to Grazing Lands or impacts to Farmland of Local Importance as a criteria. Table 7 below summarizes the extent of project impacts to Grazing Lands or Farmland of Local Importance associated with the proposed project and other projects within the cumulative analysis area.

Table 6. Specific Projects Within Cumulative Analysis Area

					Farmland Categories			
Map ID	Permit #	Name	APNs	Acreage	Urban and Built-Up Land	Other Land	Grazing Land	Farmland of Local Importance
1	TPM 20628 RPL1	Yacco Minor Subdivision	596-070-79	6.88	0.83	6.05		
2		Jamul Indian Village	597-080-04	4.67	4.23		0.4	0.04
			597-080-05	1.57	1.4	0.13	0.04	
			597-080-06	0.82	0.78	0.04		
3	TPM 20599 RPL1	Blanco Parcel Map	597-041-15	6.29		6.29		
4	TPM 20550	Morgan Minor Subdivision	597-231-19	2.04	1.69	0.35		
			597-231-20	1.2		1.2		
5	TPM 20868	Steinbarth Minor Subdivision	597-050-29	5.08		5.08		
6	P03-101	AT&T Wireless Facility	597-090-49	20.76		19.65	1.11	
7	TM 5154RPL1	Hendrix Subdivision	597-050-49	20.26		20.26		
8	TM 5289RPL2	Jamul Highlands	517-020-12 / 596-151-26	12.33	0.06	0.13	12.13	
			596-151-28	46.3	0.23	0.76	45.31	
9	TPM 20594	Pioneer Minor Subdivision	597-221-19	1.38	1.38			
10		Rancho Jamul Estates II	597-090-33	161.45		96.64	64.82	
11	TM 5460 RPL1	Simpson Farms	596-180-01	141.87	0.5	1.62	120.61	19.14
			596-180-02	16.81	0.02	3.95	12.84	
PVR Cumulative Analysis - Agricultural Resources								

Table 7. Extent of Cumulative Project Impacts

Project Map ID	Total Project Acres	Impacts to Grazing Land	Impacts to Farmland of Local Importance
1	6.88		
2	7.06	0.57	0.08
3	6.29		
4	3.24		
5	5.08		
6	20.76	1.11	
7	20.26		
8	58.63	57.44	
9	1.38		
10	161.45	64.82	
11	158.68	124.56	31.98
PVR	181.31	164.8	2.50
TOTAL IMPACT	631.02	413.3	34.56
		Existing Grazing Land	Existing Farmland of Local Importance
COUNTYWIDE TOTAL		135,002*	108,580*
CUMULATIVE IMPACT % OF EXISTING		0.3%	0.03%

*Acreages provided by California Farmland Conversion Report 2000-2002.

Cumulative Impacts to Farmland of Local Importance

“*Farmland of Local Importance*,” is defined as “Land of importance to the local agricultural economy as determined by each county’s board of supervisors and a local advisory committee.” San Diego County defines farmland of local importance as:

“Land that meets all the characteristics of Prime and Statewide, with the exception of irrigation. Farmlands not covered by the above categories but are of significant economic importance to the county. They have a history of good production for locally adapted crops. The soils are grouped in types that are suited for truck crops (such as tomatoes, strawberries, cucumbers, potatoes, celery, squash, romaine lettuce, and cauliflower) and soils suited for orchard crops (avocados and citrus).”

As can be seen in Table 7, the cumulative impact to Farmlands of Local Importance associated with the proposed project and other projects within the cumulative study area totals 34.56 acres, or 0.03% of the Countywide total acreage of Farmlands of Local Importance.

However, a review of the aerial photograph included in Addendum IV indicates that Project 11 has been used for dryland farming. According to the project environmental documentation, 31.98 acres have been used for dryland farming which gives rise to the "Farmland of Local Importance" designation.

The classification of "Farmland of Local Importance" category on Project 11 is, however, misapplied. The 31.98 acres of dryland do not qualify for the category. The land used for dryland farming associated with Project 11 fails to meet the San Diego County Board of Supervisors definition of "farmland of local importance" for two reasons. First, this land does not rise to the definition due to the low value of the dryland crops; and, secondly, this portion of the project site was not irrigated. Given the dryland farming use of this parcel, the appropriate classification of Project 11 impacted lands would be "Grazing Land." As such, the cumulative impacts to Farmlands of Local Importance associated with the proposed project in combination with other projects in the cumulative study area would more accurately total 2.58 acres.

Whether considering a total 2.58 acres of cumulative impact to Farmlands of Local Importance representing 0.002% of the total Countywide Farmlands of Local Importance, or a 34.56-acre cumulative impact representing 0.03% of the total Countywide Farmlands of Local Importance, the cumulative impact is considered less than cumulatively considerable because the loss of 0.002% loss or a 0.03% loss of area mapped as farmland of local importance would not result in a substantial shift in agricultural resources or agricultural operations within the study area or the region.

Cumulative Impacts to Grazing Lands

The remaining possible cumulative impacts arise from a portion of the soils on Projects 8, 10 and 11 being classified as suitable for "grazing land." Based on the

cumulative totals of the projects analyzed in the cumulative study area, approximately 413 acres of grazing land would be impacted through proposed development. This represents 0.3% of the Countywide total for grazing land. The loss of grazing land within the study area is not resulting in the loss of any current grazing operations or forcing other agricultural operations to cease or convert to know agricultural uses.

Other than Project 11, the actual use of the land for grazing is problematical. Another avenue to evaluate the cumulative loss of grazing land is to look at the monetary value of grazing land within the region. The range livestock industry has been in decline for a number of years, with limited demand by stockmen for smaller tracts of rangeland. Nonetheless, this assessment of the potential cumulative impacts associated with the loss of grazing land is based conservatively on an analysis of the amount of acreage impacted in relationship to the amount of grazing land countywide, rather than the potential for the specific lands actual use for grazing.

In order to assess the relationship of the cumulative amount of impacted potential grazing land to the total grazing land countywide, the annual Agricultural Commissioner's *Crop Statistics and Annual Report* was consulted. A review of data from this report for the most recent six years is set forth in the following Table 8.

Table 8. Six-Year Acreage and Value of Grazing Land in San Diego County

Year	Acres	Value/Acre	Value
2005	207,000	\$6.10	\$1,262,700
2004	202,000	\$6.00	\$1,212,000
2003	198,000	\$5.87	\$1,162,260
2002	158,000	\$5.87	\$927,460
2001	135,000	\$5.85	\$789,750
2000	95,000	\$5.01	\$475,950

From these data it is seen that the annual per acre value of grazing land (i.e., its contribution to the County's agricultural product) is between \$5.01 and \$6.10 per acre. Significantly, the number of acres valued has also increased.

When the \$6.10 per acre is applied to the cumulative Grazing Land impacted acreage of the Projects 8, 10 and 11, an annual loss of potential contribution of these

projects toward the County's agricultural product of \$1,505 is calculated. When this potential contribution is included with the 164.8 acres of the subject's soils that are classified as grazing land using the same criteria, a cumulative impact of \$1,005 results. This cumulative impact is considered not to be "cumulatively considerable" when evaluated in the context of the total countywide agricultural product of \$1,531,236 reported in 2005. Similarly, a total cumulative acreage impact of approximately 413 acres representing 0.2% of the 207,000 acres reported in 2005 is not considered to be "cumulatively considerable" because it would not represent a significant shift in agricultural resources or operations within a specific area or region. Therefore, potential cumulative impacts to Grazing Land are considered to be less than cumulatively considerable.

It should be noted that none of the projects identified in the list of projects within the cumulative impacts area of study were found to have agricultural issues or significant agricultural impacts in the environmental documentation for those projects. No agricultural activities are known to be proposed with any of these projects. None were found to affect land designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

PROJECT DESIGN AND MITIGATION

The project retains the land in an agricultural use as well as provides economic growth to the area. The design of the project includes two equestrian centers. This type of agri-business provides a positive economic impact to the San Diego County region. The inclusion of the equestrian centers and the proposed residential densities that will be able to support agriculture, mitigates potential adverse impacts from the project to agricultural land. Further, the level of economic activity from these centers will provide a new source of input to the region's gross agricultural product.

The project is sensitive to the conservation of agriculture resources as well as the possible conflict that sometimes arrives when agricultural activity is conducted in conjunction with residential use. The project design generally maintains a 100-foot

buffer between the stables and the proposed residential dwellings pads, other than the specific dwellings associated with the equine lots. This buffer extends to adjoining residential dwellings as well.

The project's design includes sufficient buffers for compatibility with adjacent activity. The subject mitigates the loss of past farming activities by substituting more intense agricultural activity. The design of the project should blend with the current character of the neighborhood.

Finally, the project will require that the applicant submit an application to the State of California, Department of Real Estate (DRE) for a Public Report ("White Paper") that will disclose the existence of the current and potential future agriculture activities, both on-site and off-site, and how these activities might affect the use and enjoyment of the property. (Refer to the information to be included in the application for a Final Public Report submitted to the California DRE included in Appendix D as San Diego County Code §63.404 *Notice to Prospective Buyers and Occupiers*).

CONCLUSION

It is concluded that the project has no net loss to the county's agricultural product economy. It is also concluded, based on the list of projects method used to identify projects that may have a possible cumulative impact on agriculture within the study area, that there are no significant cumulative impacts that arise as a consequence of the project. The agricultural component of the project is compatible with the community and will integrate easily within the existing land uses.

This conclusion is based upon the analysis of both project related and cumulative impacts relating to the thresholds of significance with which the project is to be measured, as identified in this report and reiterated below.

1. Will the project result in Land Evaluation and Site Assessment (LESA) Model total scores greater than or equal to 40 points with sub-scores for Land Evaluation (LE) and Site Assessment (SA) that are each greater than or equal to 20 points, as indicated by the LESA Scoring Table?

No. Using the State of California's LESA point based system to evaluate the significance of the site as an agricultural resource yields a total score of 36, below the 40 point significance threshold, with sub-scores for the Land Evaluation and for the Site Assessment that are not each greater than 20. Therefore, based on the above, the project's potential impacts on agricultural resources as defined by the project site's LESA score are less than significant.

2. Is the project within an agricultural preserve? Will the project conflict with permitted uses on land subject to a Williamson Act contract?

No. The proposed project is not within an agricultural preserve and is not subject to a Williamson Act contract. Thus, the project will not conflict with permitted uses on land subject to a Williamson Act contract. As such, potential impacts related to permitted uses on lands subject to a Williamson Act contract are less than significant.

3. Will the project result in changes to the existing environment, which due to the location or nature, could result in the conversion of Farmland to a non-agricultural use.

No. The project's intended use, location and nature is compatible with the area's agricultural land uses as well as creating increased demand for locally produced dryland hay, grain and straw to support the project's equine uses. No conflicts, indirect or fringe impacts on surrounding agriculture have been identified. Additionally, all of the subject property, when properly classified, should be mapped as Grazing Lands with the exception of the area previously cultivated as an organic farm, which would qualify for the Farmlands of Local Importance designation. Therefore, the project will not remove land designated as Prime Farmland,

Unique Farmland, or Farmland of Statewide Importance because, when properly classified, none such classified land exists onsite. Furthermore, the project proposes an equine component and has created residential parcels that are large enough to support cottage agricultural activities, should the future residents choose to engage in such operations. Therefore, potential impacts related to the conversion of Farmland to a non-agricultural use are less than significant.

4. Will the project conflict with the County General Plan's agricultural policies listed in its Land Use Element, Conservation Element, or Open Space Element, or in the Jamul/Dulzura Subregional Plan?

No. The project is consistent with the agricultural goals and policies of the County's General Plan as listed in the Land Use Element, Conservation Element and Open Space Element as discussed in this report. The removal of dry farming from that portion of the property which is the least productive land, and substitution of the proposed equine facilities on portions of the site with better soils, at a minimum results in no net loss of agricultural economic resources. Furthermore, the creation of large lot residential parcels with all services available could increase the feasibility of new agriculture operations to be initiated by individual owners, conforming with the community agricultural goals of *"...all agricultural activities, large and small, which provide a local or regional source of food/fiber/fuel will be encouraged where water and land resources are available"*. The proposed use is also in conformance with the Recreational Element of the County General Plan that states, *"Private enterprise should be encouraged to provide additional recreational facilities for the*

community. . . .” As such, potential impacts relating to consistency with agricultural goals and policies are less than significant.

5. Will the project create a conflict with permitted uses on agriculturally zoned land?

No. The proposed equine and residential use is a conformance with the agricultural zoning for the land and is compatible with existing uses in the neighborhood, with no significant impact on any existing agricultural uses in the area. As such, potential impacts are less than significant.

6. Will the project have impacts that are individually limited, but cumulatively considerable? (“cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).

No. The cumulative impact of the loss of acres of Grazing Land representing 0.3% of the Countywide total of Grazing Land, and acres of Farmland of Local Importance representing 0.03% of the Countywide total of Farmlands of Local Importance is considered a less than significant percentage. Additionally, when Cumulative Project Number 11 is correctly classified, the loss of Farmlands of Local Importance is reduced to 2.58 acres representing less than 0.002% of the Countywide total.

Prepared By:

James W. Wheyland, CAC, ARA

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APPENDICES

APPENDIX A

Good Faith Organic Farm Product List

The Good Faith Organic Farm

14135-A Campo Road, Jamul, CA 91935

Phone (619) 669-6721 Fax (619) 669-9912

For the Month of February

ORDER:

Salad Greens

Spring Mix, Small and Tender Leaves, Mostly Sweet with Some Spicy and Bitter

Garden Mix, All the Flavors and Textures of the Garden, Larger and More
Hardy Leaves and Stems, More Bitter

Spinach**: Savoyed, Mild Flavor for Fresh Salads, Loose-Leaf

Arugula: Baby to Medium Sized Leaves, Loose-Leaf

Arugula*: Larger Leaves and Stems, Bunched, More Pungent

Mache (Corn Salad) *: Baby Leaves, Loose-Leaf

Lettuces**: Butter and Heirloom Varieties, Red and Green, Medium Size Heads

Escarole: Baby to Medium Size Leaves, Slightly Bitter, Loose-Leaf

Other Vegetables

Braising Mix: Medium to Small Leafs of Dino and Red Russian Kale, Swiss
Chard, Red Mustard and Oriental Greens

New Zealand Spinach*: for Cooking (High in Oxalic Acid)

Radish**: Small Round, Red w/Greens

Broccoli**: Baby Broccoli (2nd Cuttings), for Stir-Fry

Snow Peas**: Perfect for Stir-Fry

Swiss Chard*: Red, Green or Rainbow, Bunched

Beets*: Bunched w/Greens, Small Bulbs

Carrots**: Table Varieties, Bunched

Dandelion: Red Ribbed or Green Leaf, Bunched

Cabbage Leaves*: Green or Red, Sweet Flavor, Bunched

Cabbage*: Green, with a Little Bite, Small Heads

Celery**: Deep Mineral Flavor, Slender Stalks

Herbs and Flowers

Parsley: Italian (Flat Leaf), Bunched

Cilantro*: Bunched

Dill*: Bunched, also Available in Flowers (for Pickles)

Rosemary: Bunched

Chamomile: Roman, Large Budding Flowers, Bunched

*** (Available in Limited Supply)**
**** (Available in Very Limited Supply)**

The Good Faith Organic Farm

14135-A Campo Road, Jamul, CA 91935

Phone (619) 669-6721 Fax (619) 669-9912

September

ORDER:

Salad Greens

_____ Spring Mix*: Small and Tender Leaves, Mostly Sweet with Some Spicy and Bitter

_____ Garden Mix*: All the Flavors and Textures of the Garden, Larger and More
Hardy Leaves and Stems, More Bitter

_____ Arugula: Baby to Medium Sized Leaves, Loose-Leaf

_____ Arugula**: Bunched, Larger Leaves and Stems, More Pungent

_____ Sylvestra Arugula*: Sweet Pungent Taste, Rare, Loose-Leaf

_____ Escarole**: Baby to Medium Size Leaves, Sweet and Bitter, Loose-Leaf

_____ Frisee**: Green to White Leaves, Mostly Bitter, Loose-Leaf

Other Vegetables

_____ Braising Mix: Medium to Small Leafs of Dino and Red Russian Kale, Swiss
Chard, Red Mustard and Oriental Greens (with or w/o Minutina)

_____ Red Russian Kale**: Small to Medium Leaves, Sweet Mineral Flavor, Loose-Leaf

_____ Dino Kale*: Small to Medium Leaves, Sweet Mineral Flavor, Loose-Leaf

_____ Chives**: Small to Medium Size, Bunched

_____ Green Onions**: Small to Medium Size, Bunched

_____ Sweet Peppers**: Yellow and Red, Small to Medium Size

_____ Swiss Chard*: Red, Green or Rainbow, Bunched

_____ Gold Zucchini: Small to Medium Size

_____ Heirloom Zucchini*: Light Green with Lengthwise Ridges

_____ Cucumber, Japanese**: Thin Skinned, Seedless and Burpless

_____ Cucumber, Lemon**: Thin Skinned, Lemon Color and Taste

_____ Cucumber, Diva**: Thin Skinned, for Slicing

_____ Beets: Bunched w/Greens, Medium to Large Bulbs

_____ Beet Bulbs: Loose, Medium to Large Bulbs

_____ Carrots**: Table Varieties, Fairly Small, Bunched

_____ Dandelion: Red Ribbed or Green Leaf, Bunched

_____ Tomatoes *: Garden and Heirloom Varieties, Mostly Soft and Juicy

_____ Cherry Tomatoes *: Pint Baskets, Gold, Yellow and Red Varieties

_____ Eggplant*: Italian and Japanese Varieties, Flavorful

Herbs and Flowers

_____	<u>Italian Parsley</u> : Bunched
_____	<u>Rosemary</u> *: Bunched
_____	<u>Lemon Verbana</u> : Bunched
_____	<u>Basil</u> : Bunched or Loose Leaf

* (Available in Limited Supply)

** (Available in Very Limited Supply)

APPENDIX B

Phase I Environmental Site Assessment by RBF Consulting, dated January 24, 2003,
under separate cover;

Report of Site Reconnaissance by Kleinfelder, Inc., dated May 15, 2003, under separate
cover;

Limited Environmental Assessment and Recommended Action Plan, dated November 10,
2006; under separate cover.

APPENDIX C

The California Agricultural Land Evaluation and Site Assessment Model and Zone of
Influence Inventory

Table 1 LAND EVALUATION (LE)

PROJECT NAME : Peaceful Valley Ranch, LLC
 PROJECT IDENTIFICATION: APN 597-050-13; 597-060-02; 597-070-02,07
 PROJECT ACREAGE: 181.55

Soils Identification, Distribution and Evaluation

Soils Symbol & Name	Percent		Soil Capability Classification By Acre										Storie		Percent		Storie	
	Slope		I	Ile	Ils,w	IIe	IIIs,w	I'VE	IVs,w	Ve,s,w	Vle,s,w	VIIe,s,w	VIIIe,s,w	Index	Acres	Distribution	Index	Score
AvC Arlington coarse sandy loam	2	9												47	0	0.0%	0.0	
BIC Bonsall sandy loam	2	9												51	0	0.0%	0.0	
BmC Bonsall sandy loam, thick surface, eroded	2	9												51	0	0.0%	0.0	
BsC Bosanko clay	2	9												32	0	0.0%	0.0	
BsD Bosanko clay	9	15												27	0	0.0%	0.0	
BsE Bosanko clay	15	30												26	0	0.0%	0.0	
BtC Bosanko stony clay	5	9												25	0	0.0%	0.0	
GrC Greenfield sandy loam	5	9												77	0	0.0%	0.0	
GrD Greenfield sandy loam	9	15												69	0	0.0%	0.0	
CiD2 Cieneba coarse sandy loam	5	15												16	0	0.0%	0.0	
CmE2 Cieneba rocky coarse sandy loam	9	30												10	16.37	9.0%	0.9	
CnE2 Cieneba Fallbrook rocky sandy loams, eroded	9	30												18	0	0.0%	0.0	
CnE2 Cieneba Fallbrook rsl, eroded, rock outcrop	9	30												0	0	0.0%	0.0	
CnG2 Cieneba Fallbrook rocky sandy loams, eroded	30	65												7	0	0.0%	0.0	
CnG2 Cieneba Fallbrook rsl, eroded, rock outcrop	30	65												0	0	0.0%	0.0	
CmrG Cieneba very rocky coarse sandy loam	30	75												2.5	0	0.0%	0.0	
Co Clayey alluvial land	0	2												44	0	0.0%	0.0	
FaC2 Fallbrook sandy loam, eroded	5	9												51	0	0.0%	0.0	
FaD2 Fallbrook sandy loam, eroded	9	15												55	80.77	44.5%	24.5	
FaE2 Fallbrook sandy loam, eroded	15	30												35	19.87	10.9%	3.8	
FeE2 Fallbrook rocky sandy loam, eroded	9	30													7.42			
FvE Fallbrook-Vista sandy loams	15	30												45	0	0.0%	0.0	
FvD Fallbrook-Vista sandy loams	9	15												54	0	0.0%	0.0	
LpC2 Las Posas fine sandy loam, eroded	5	9												34	0	0.0%	0.0	
LpD2 Las Posas fine sandy loam, eroded	9	15												33	0	0.0%	0.0	
LpE2 Las Posas fine sandy loam,eroded	15	30												26	0	0.0%	0.0	
PeC Placentia sandy loam	2	9												49	0	0.0%	0.0	
PIC Placentia sandy loam, thick surface	2	9												60	0	0.0%	0.0	
PeD2 Placentia sandy loam, Placentia sandy loam, eroded	9	15												41	0.18	0.1%	0.0	
RaB Ramona sandy loam	2	5												65	27.76	15.3%	9.9	
RaC Ramona sandy loam, eroded	5	9												58	0	0.0%	0.0	
RaC2 Ramona sandy loam, eroded	5	9												51	19.5	10.7%	5.5	
RaD2 Ramona sandy loam, eroded	9	15												48	0	0.0%	0.0	
SpG2 Sheephead rocky fine sandy loam, eroded	30	65												2.5	0	0.0%	0.0	
SsE Soboba stony loamy sand	9	30												24	0	0.0%	0.0	
TuB Tujunga sand	0	5												39	6.77	3.7%	1.5	
VaA Visalia sandy loam	0	2												90	0	0.0%	0.0	
VaB Visalia sandy loam	2	9												81	0	0.0%	0.0	
VvD Vista rocky coarse sandy loam	5	15												27	0	0.0%	0.0	
VsD Vista coarse sandy loam	9	15												43	0	0.0%	0.0	
VsD2 Vista coarse sandy loam, eroded	9	15												40	0	0.0%	0.0	
VsE Vista coarse sandy loam	15	30												35	0	0.0%	0.0	
VsE2 Vista coarse sandy loam	15	30												33	0	0.0%	0.0	
VvE Vista rocky coarse sandy loam	15	30												22	2.91	1.6%	0.4	
AcG Acid igneous rock														0	0	0.0%	0.0	
StG Steep Gullied Land														5	0	0.0%	0.0	
TeF Terrace Escarpments														0	0	0.0%	0.0	
Total Acres By Capability Classification			0.0	27.8	0.0	19.5	0.0	81.0	6.8	0.0	30.2	16.4	0.0		181.55	95.9%	46.5	
Percent Distribution By Capability Classification			0.0%	15.3%	0.0%	10.7%	0.0%	44.6%	3.7%	0.0%	16.6%	9.0%	0.0%			100.0%		
Value			100	90	80	70	60	50	40	30	20	10	0					
LCC Score			0.00	13.76	0.00	7.52	0.00	22.29	1.49	0.00	3.33	0.90	0.00					
Total LCC Score (to Table 3)	49.3																	
Storie Index Score (to Table 3)	46.5																	

Source: Soil Survey, San Diego County, California; U.S. Dept. Of Agriculture, Soil Conservation Service, in cooperation with U.C. Agricultural Experiment Station, Pacific Consultants

Table 2. SITE ASSESSMENT

Source: Instruction Manual, California Agricultural Land Evaluation And Site Model

PROJECT NAME : Peapack Valley Ranch, LLC
 PROJECT IDENTIFICATION APN 597-050-13; 597-060-02; 597-070-02,07
 PROJECT ACREAGE: 181.55

Site Assessment Item 1 - Project Size Score

Capability	Acreage	Score
Class I or II	27.8	30
Class III	19.5	30
Class IV >	134.3	40
	181.55	

Highest Project Size Score (to Table 3) 40

Table of Project Scoring Points

Acres	Class I or II	Acres	Class III	Acres	Class IV >
> 80	100	> 160	100	> 320	100
60-79	90	120-159	90	240-319	80
40-59	80	80-119	80	160-239	60
20-39	50	60-79	70	100-159	40
10-19	30	40-59	60	40-99	20
< 10	0	20-39	30	< 40	0
		10-19	10		
		< 10	0		

1. From Table 1

Site Assessment Item 3 - Surrounding Agriculture Land Score

Ag Use In ZOI ¹	Availability Score
< 40	0

Surrounding Ag Land Use Rating Score (to Table 3) 0

Percent of Project's Zone of Influence In Ag. Use	Surrounding Ag. Land Score
90 - 100	100
80 - 89	90
75 - 79	80
70 - 74	70
65 - 69	60
60 - 64	50
55 - 59	40
50 - 54	30
45 - 49	20
40 - 44	10
< 40	0

Site Assessment Item 2 - Water Resource Availability

Portion of Project	Water Source	Acreage	Availability Score	Weighted Score
1	7	0.09	65	6.09
2	8	0.47	50	23.35
3	13	0.44	20	8.79
4				

Project Water Availability Score (to Table 3) 38.23

Table of Water Resource Availability Scoring Points

Option	Non-drought Years			Drought Years			Score
	Irrigated Production Feasible	Physical Restrictions	Economic Restrictions	Irrigated Production Feasible	Physical Restrictions	Economic Restrictions	
1	Yes	No	No	Yes	No	No	100
2	Yes	No	No	Yes	No	Yes	95
3	Yes	No	Yes	Yes	No	Yes	90
4	Yes	No	No	Yes	Yes	No	85
5	Yes	No	No	Yes	Yes	Yes	80
6	Yes	Yes	No	Yes	Yes	No	75
7	Yes	Yes	Yes	Yes	Yes	Yes	65
8	Yes	No	No	No	-	-	50
9	Yes	No	Yes	No	-	-	45
10	Yes	Yes	No	No	-	-	35
11	Yes	Yes	Yes	No	-	-	30
12	Irr. not feasible, but rainfall adequate for dryland in drought and non-drought						25
13	Irr. not feasible, but rainfall adequate for dryland only in non-drought years						20
14	Neither irrigated nor dryland production feasible						0

Site Assessment Item 4 - Surrounding Protected Resource Score

Protected Use In ZOI ¹	Availability Score
0	0

Surrounding Protected Land Use Rating Score (to Table 3) 0

Percent of Project's Zone of Influence Protected	Surrounding Protected Resource Score
90 - 100	100
80 - 89	90
75 - 79	80
70 - 74	70
65 - 69	60
60 - 64	50
55 - 59	40
50 - 54	30
45 - 49	20
40 - 44	10
< 40	0

1. ZOI = Zone of influence which is w/in 1/4 - mile of project

THE CALIFORNIA AGRICULTURAL LAND EVALUATION AND SITE ASSESSMENT MODEL

- 0-39 Not considered significant.
 40-59 Considered significant only if Land Evaluation (LE) and Site Assessment (SA) subscores are each greater than or equal to 20 points.
 60-79 Considered significant. unless either LE or SA subscore is less than 20 points.
 80-100 Considered significant.

PROJECT NAME : Peqaceful Valley Ranch, LLC
 PROJECT IDENTIFICATION: APN 597-050-13; 597-060-02; 597-070-02,07
 PROJECT SIZE IN ACRES 181.55

Table 3. Summary - Final LESA Score Sheet

FACTOR NAME	RATING (0-100 points)	X	FACTOR	WEIGHTED SCORE
LAND EVALUATION (LE)				
	(from Table 1)			
1 Land Capability Classification	49.3		0.25	12
2 Storie Index Rating	46.5		0.25	12
Total Land Evaluation Score			0.50	24
SITE ASSESSMENT (SA)				
	(from Table 2)			
1 Project Size	40		0.15	6
2 Water Resource Availability	38		0.15	6
3 Surrounding Agricultural Lands	0		0.15	0
4 Protected Resource Lands	0		0.05	0
			0.50	12
TOTAL LESA SCORE				36

LESA MODEL CEQA THRESHOLDS

0 - 39 Points	Not considered significant
40 - 59 Points	Significant <u>only</u> if LE <u>and</u> SA subscores are each greater than or = to 20 points.
60 - 79 Points	Significant <u>unless</u> either LE <u>or</u> SA subscores is <u>less</u> than 20 points.
80 -100 Points	Significant.

APPENDIX D

Peaceful Valley Ranch Horse Boarding, Breeding and Training Agribusiness,
by Dennis Moser of Moser Ventures and Jocelyn Parker

Peaceful Valley Ranch Horse Boarding, Breeding and Training Agribusiness

One of the main agricultural operations incorporated in the proposed Peaceful Valley Ranch project is the boarding, breeding, training and sales of specially trained horses. This operation consists of two separate and distinct horse specialty areas: Hunter/Jumper trained horses and Polo horses. The economic viability and contribution to the agribusiness related to each of these horse-rearing specialties is described in detail below.

The history of the horse-rearing business in San Diego is quite extensive. San Diego is home to virtually all horse breeds and all horse sports, including horse racing and race training, polo, hunter/jumper competitions, dressage competitions and western cutting, reining, roping, team penning, and pleasure events. Competitions include both trail and endurance events. All of these events are held at different skill levels, from the "A" circuit events to "C" rated county shows. There are several pony clubs throughout San Diego and both mounted police and border patrol units. Because of this vast extent of horse activities, year-round horse riding weather, and extensive wilderness areas and riding trails, San Diego has long had a thriving horse industry.

Public Stable & Hunter/Jumper Facility:

Within San Diego County, there are literally hundreds of hunter/jumper facilities. In Jamul, there are approximately 6 such facilities, but only one other high quality facility. Many facilities do not hold competitions on their own grounds due to the large number of competitions offered each weekend throughout the region. Among the more notable competitions, San Diego hosts the "A" rated Del Mar National series during three weeks in the summer. There is also an "A" rated Ride America series during the summer. Both of these events attract well-known international riders and horses due to the prize money offered. County level shows and competitions are held throughout the year.

The Peaceful Valley Ranch Hunter/Jumper Equestrian Facility is planned as a signature entry element located adjacent to SR-94 at the entrance to the Peaceful Valley Ranch community. This facility is envisioned as a high-end boarding and training facility for arena type riding shows and events. The facility will include several barns to accommodate up to 30 horses, several small paddocks for daily horse turn-outs, and an arena with jumps for training and horse show purposes. Boarding and training activities will be available to the general public on a fee basis.

The architectural characteristics of the facility will be refined and the landscaping will be extensive, all befitting a high-end horse training facility, not unlike those facilities found in Rancho Santa Fe and Fairbanks Ranch areas of San Diego.

The local boarding rate for stables in Jamul is between \$200.00 to \$350.00 per month per horse. Training costs can add an additional \$400.00 per month per horse. It is anticipated that, because of its location, design and amenities, the Peaceful Valley Ranch facility will attract the high-end user, those individuals with above-average income for horse owners. Inasmuch as there is only one other such high-end facility in the Jamul

area, Peaceful Valley Ranch will be filling a horse boarding, breeding and training market need in this market segment for hunter/jumper horses. It is further anticipated that this facility will generate a gross contribution to the regional agribusiness economy of approximately \$270,000, including boarding fees, training fees competition fees and daily use fees. Furthermore, the facility will generate additional demand for horse feed, veterinary services, riding gear and ancillary riding and show services and products.

Private Stable / Polo Training Facility:

Facilities for polo horse training and polo play are extremely limited in San Diego County. The San Diego Polo Club, located in Rancho Santa Fe, is the main polo club in the region. A second facility is located in Lakeside. The Lakeside polo club includes a small boarding facility and a non-regulation sized playing field. The third facility located in Poway. This facility is also small and polo play is limited to the community riding facility arena.

The Peaceful Valley Ranch Training Facility and Polo Field is envisioned as the premier polo horse breeding, boarding and training facility in San Diego County. The facility will be privately owned and operated, for the main agribusiness purpose of acquiring thorough-bred horses that are unsuitable for racing, boarding and training those horses for polo play, and ultimately selling those horses to the polo enthusiast. The facility itself will be of the highest quality befitting the image and nature of the polo sport business, and will include several barns to accommodate up to 60 polo ponies, paddocks for daily horse turn-out, a regulation size polo field of 160 yards by 300 yards plus run-on areas, with a training track surround.

The selling price for a well-trained 3 to 5-year old polo pony can vary from \$20,000 to \$40,000 per horse, depending on the quality of the horse and the quality of the training. It is envisioned that approximately 10 high quality, highly-trained polo ponies will be sold from the facility annually, for an annual gross contribution to the County agribusiness economy of approximately \$200,000 to \$400,000. More importantly, this facility will provide a specialized breeding, boarding and training facility not available anywhere else in the County.

In summary, the proposed Peaceful Valley Ranch equestrian facilities could add as much as \$1 million annually to the regional agribusiness economy, when considering all of the related and ancillary services and products associated with rider training and the boarding, breeding, training and sale of the horses.

APPENDIX E

San Diego County Code §63.404 *Notice to Prospective Buyers and Occupiers*

San Diego County Code of Regulatory Ordinances
TITLE 6 HEALTH AND SANITATION
DIVISION 3. CROPS AND PLANTS

SECTION 63.404 NOTICE TO PROSPECTIVE BUYERS AND OCCUPIERS.

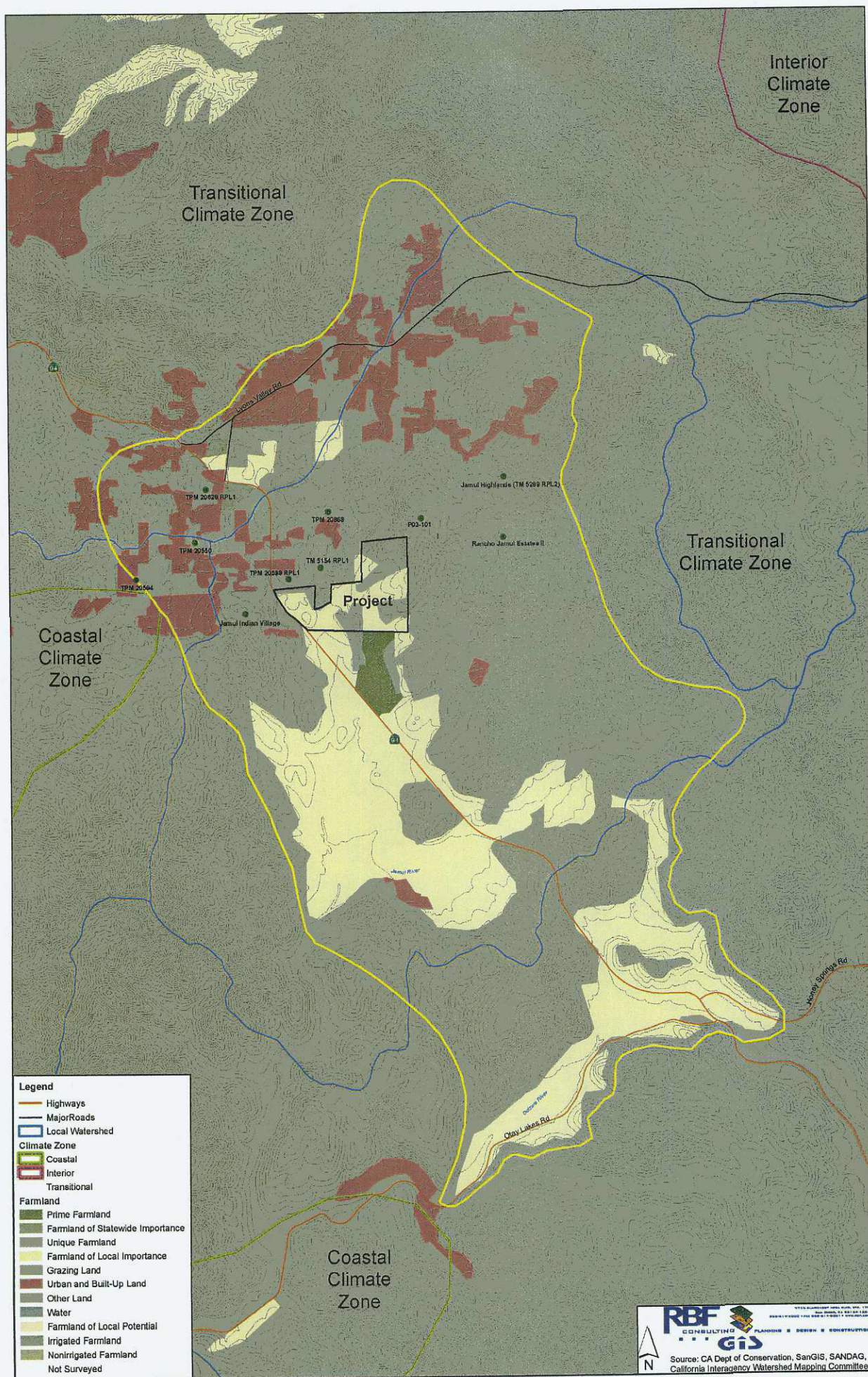
- (a) Any person selling, leasing or renting real property, which is within an agricultural area may notify any prospective purchaser or occupier of such real property in writing as follows:

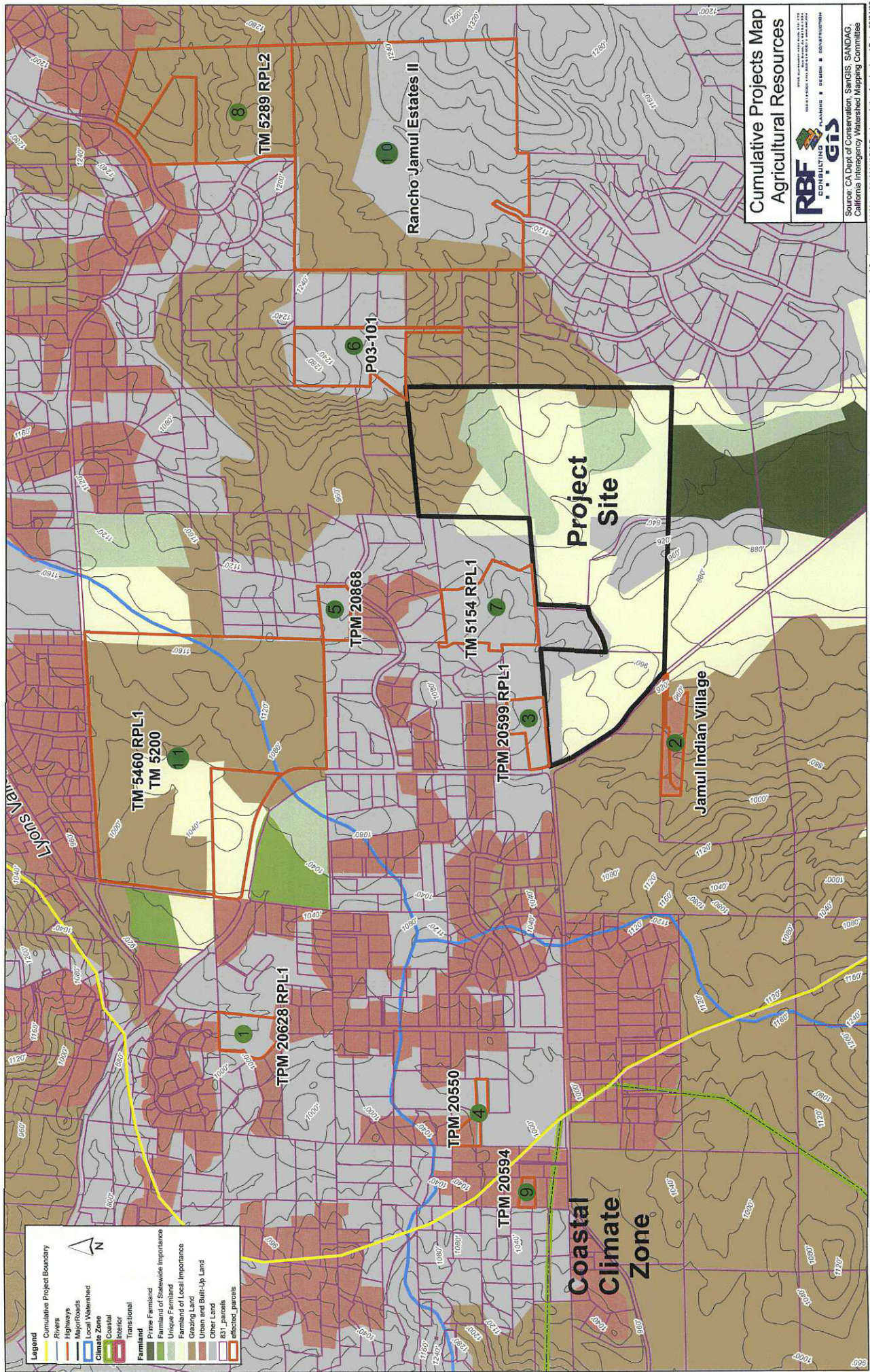
“The subject property may be located within one mile of agricultural enterprises. Occupants of this property may be exposed to inconveniences or irritations arising from agricultural enterprises, including but not limited to cultivation, plowing, spraying, pruning, harvesting, drying, crop protection from the elements or depredation which generates dust, smoke, noise, insects, rodents, and odor, and the use of agricultural chemicals, including but not limited to herbicides, insecticides, fungicides, rodenticides, and fertilizers. Occupants of the property may be required to accept such inconveniences and irritations, unless the agricultural enterprise constitute a public or private nuisance despite the provisions of Section 3482.5 of the Civil Code or Section 63.403 of the San Diego County Code. It is understood that agricultural uses may be altered or expanded in the future. Further information concerning enrolled agricultural activities or enterprises within one mile of this property may be obtained from the County Department of Agriculture, Weights and Measures upon payment of the applicable fees under the California Public Records Act.

- (b) For the purposes of this Chapter, an agricultural area is defined as property which is: (1) within an agricultural zone; (2) being used for an agricultural activity or operations; or (3) located within one mile of the boundary of property which is being used for an enrolled agricultural enterprise as defined in Section 63.405.

APPENDIX F

Cumulative Projects from the San Diego County Planning Department
and the Cumulative Projects Map





Cumulative Projects Map Agricultural Resources



Source: CA Dept of Conservation, SanGIS, SANDAG, California Interagency Watershed Mapping Committee

Cumulative Projects From San Diego County Planning Department

Site Number	Reference/Project Number	Name	Characteristics	Impacts
PROJECTS CONSIDERED FOR CUMULATIVELY CONSIDERABLE TRAFFIC, BIOLOGICAL, NOISE, CULTURAL AND AIR QUALITY				
1	TPM 20628RPL1 Log No. 01-19-024	Yacoo Minor Subdivision	4 SF Residential Lots & 1 Remainder Lot	<p><i>Traffic</i> 48 ADT generated</p> <p><i>Biology</i> 1.19 acres (mitigation) Coastal sage scrub</p>
2	Fee-to-Trust Transfer and Casino Project	Jamul Indian Village	<p><i>(Alternative A – Preferred Project)</i> Gaming casino, hotel, event center, health center, housing, parking garage, tribal government center</p>	<p><i>Traffic</i> 9,600 ADT generated <i>(Worst-case alternative scenario: 37,000 ADT)</i> Impacts on SR-94, Jamacha to Steele Canyon Road; SR-94, Steele Canyon to Lyons Valley Road; SR-94, Lyons Valley Road to Maxfield Road; SR-94, Maxfield Road to Melody Road Impacts on SR-94 between Jamacha Boulevard and Jamacha Road Impacts on SR-94/Jamacha Road/SR 54, SR-94/Cougar Canyon Road, SR-94/Steele Canyon Road</p> <p><i>Noise</i> Potential noise impacts resulting from increased on-site (casino patrons and service vehicles) and off-site (SR-94) traffic, project construction, mechanical equipment, deliveries and loading.</p>

Site Number	Reference/Project Number	Name	Characteristics	Impacts
2 (continued)	Fee-to-Trust Transfer and Casino Project	Jamul Indian Village		<p><i>Biology</i></p> <p>Substantial clearing and grading required</p> <p>Potential for impacts on Coastal sage scrub, Grazed Coastal sage scrub, Coast Live Oak Riparian Woodland</p> <p>35.9 acres of Grazed Coastal sage scrub</p> <p>0.05-acre wetland habitat.</p> <p><i>Cultural</i></p> <p>Significant cultural resources exist on the project site.</p>
3	TPM 20599 RPL1 Log No. 01-19-007	Blanco Parcel Map	4 SF Residential Lots 6.2 acres	<p><i>Project On Hold</i></p> <p><i>Traffic</i></p> <p>48 ADT generated</p> <p>Impacts on Melody Road/SR-94 along project frontage</p> <p>SR-94/Melody Road intersection impacted</p> <p><i>Biology</i></p> <p>Potential impacts to Diegan coastal sage scrub</p> <p><i>Cultural</i></p> <p>Per phone conversation with Gale Wright on July 28, 2005 Significant cultural resource located on property. Significant under both CEQA and RPO.</p>

Site Number	Reference/Project Number	Name	Characteristics	Impacts
4	TPM 20550	Morgan Minor Subdivision	2 SF Estate Lots	<p><i>Traffic</i> 24 ADT generated</p> <p><i>Biology</i> 0.20-acre Diegan coastal sage scrub 0.10-acre Southern mixed chaparral 0.007 acre freshwater seep</p> <p><i>Cultural</i> No impacts identified. Based on Mitigated Negative Declaration dated July 12, 2001.</p>
5	TPM 20868 Log No. 91-19-038	Steinbarth Minor Subdivision	2 SF Lots 5.14 acres	<p><i>Traffic</i> 24 ADT generated</p> <p><i>Biology</i> Potential impacts on Diegan coastal sage scrub</p> <p><i>Cultural</i> No impacts identified. Based on Notice of Negative Declaration dated January 28, 1992.</p>
6	P03-101 ER 0319016A	AT&T Wireless Facility	1 SF Residence 20.9 acres	<p><i>Traffic</i> 12 ADT generated</p> <p>Potential impacts on Diegan coastal sage scrub (fuel modification)</p> <p>Potential noise impacts to adjacent land uses</p>
7	TM 5154 RPL1 Log 98-19-021	Hendrix Subdivision	5 SF Estate Lots 11.21 acres	<p><i>Traffic</i> 60 ADT generated Jefferson Road/SR-94 intersection impacted</p> <p><i>Biology</i> 1.1 acres Diegan coastal sage scrub</p> <p><i>Cultural</i> No impacts identified. Based on a County letter dated April 5, 2001.</p>

Site Number	Reference/Project Number	Name	Characteristics	Impacts
8	TM 5289RPL2 ER 03-19-04	Jamul Highlands	23 SF Residential Lots 60 acres (includes approximately 36 acres of biological open space)	<i>(currently under review)</i> <i>Traffic</i> 300 ADT generated Traffic impacts on Jamul Highlands Road <i>Biology</i> 0.31 acre Diegan Coastal sage scrub 3.04 acres Southern Live Oak Riparian Forest 20.21 acres Chamise Chaparral 0.60 acre Urban Habitat <i>Cultural</i> Impacts mitigated by an open space easement for portion of a motorcycle trail in an archeological site. Based on County Comment Letter dated September 23, 2003.
9	TPM 20594 Log No. 01-19-004	Pioneer Minor Subdivision	3 SF Estate Lots	<i>Traffic</i> 36 ADT generated <i>Biology</i> 0.3 acre (mitigation) Tier II Buckwheat scrub 0.6 acre (mitigation) Tier III non-native grassland <i>Cultural</i> No impacts identified. Based on Mitigated Negative Declaration dated August 2, 2001.
10		Rancho Jamul Estates II	68 lots (allowed) Project is ongoing and no specific design has yet been proposed, nor has an application been submitted.	816 ADT generated (estimated) As the project has not yet been designed and no application has been submitted, potential significant impacts cannot be assessed at this time.

TM = Tentative Map; TPM = Tentative Parcel Map; P = Major Use Permit; ADT = Average Daily Traffic

APPENDIX G

Consultant's Resume

PACIFIC CONSULTANTS

STATEMENT OF QUALIFICATIONS

JAMES W. WHEYLAND

Certified Agricultural Consultant

Appraisal
Agricultural Consultants
Economic and
Financial Analysis

EDUCATION

B.S. Farm Management - 1962

California Polytechnic State University, San Luis Obispo, California

Farm Credit Principles and Practices for Fieldmen - 1968

Federal Intermediate Credit Bank, Berkeley, California

Principles of Rural Appraising - 1979

American Society of Farm Managers and Rural Appraisers

Oregon State University, Corvallis, Oregon

Advanced Case Studies in Rural Valuation - 1983

American Society of Farm Managers and Rural Appraisers

California Polytechnic State University, San Luis Obispo, California

EMPLOYMENT HISTORY

1974 - Present Pacific Consultants; Agricultural Consultant

1978 - 1985 Pacific Southwest Mortgage; Agricultural Investment
Officer

1970 - 1974 Western Agri-Systems; Senior Vice President, Agricultural
Operations

1968 - 1970 Imperial-Yuma Production Credit Association; Appraiser,
Agricultural Loan Officer

1966 - 1968 Orita Land and Cattle Co.; Production

1960 - 1966 U.S. Marine Corps; Captain

CONSULTING EXPERIENCE

Consulting activities include assignments in Arizona, California, Colorado, Hawaii, Idaho, Nevada, New Mexico, Oregon, and Texas, as well as Central America and Mexico. The focus of my consulting practice over the last 30 years has been the evaluation of natural and economic resources, applied agricultural economics, financial and investment analysis including casualty, economic loss and valuation. Assignments include a wide variety of agricultural activities such as uses for land in transition, irrigated row and field crops, dry farms, livestock ranches, dairies, tree and vine crops, vineyards, groves and orchards. Some examples of agribusiness assignments are dairy, livestock, greenhouse and container nurseries, wineries, transportation and distribution, chemical compounding plants, cotton gins, irrigation districts, feed mills, grain storage, commodity shipping facilities, cold storage and fresh fruit and vegetable packing plants.

AFFILIATIONS

American Society of Agricultural Consultants, designated as Certified Agricultural Consultant (CAC)*, June, 1983; Western Regional Director 1995-1997; Director At Large 1990-92; American Society of Agricultural Consultants International Board of Governors 1990-1993

Professional Member of American Society of Farm Managers and Rural Appraisers, and its California Chapter. I hold the Accredited Rural Appraiser (ARA)* designation awarded November 1987 by the American Society of Farm Managers and Rural Appraisers to those members who have had years of experience, are technically trained, have passed a rigid examination and subscribe to a high code of ethics. I have served as President, California Chapter 1995-1996.

QUALIFIED EXPERT

Superior Court, California: Fresno County, Imperial County, Kern County, Riverside County, San Diego County.
Superior Court, Arizona: Maricopa County

Circuit Court of the Second Circuit – State of Hawaii

U.S. District Court - Southern District, San Diego

SIGNIFICANT SHORT COURSES

American Society of Agricultural Consultants, International. Preparation, Evaluation and Marketing of Agribusiness Projects, St. Louis, Mo - 1986

The International Erosion Control Association Practical Approaches for

Effective Erosion and Sediment Control - Reno, NV. - 1994

American Society of Appraisers and American Society of Farm Managers and Rural Appraisers

Rural Business Valuation - Sacramento, Ca – 1997

American Society of Farm Managers and Rural Appraisers Report Writing - Bakersfield, Ca 1984

Mathematics of Finance - Denver, Co 1987

Sales Analysis - Denver, Co - 1987

Cost Approach - Denver, Co - 1987

Eminent Domain - Denver, Co - 1987

Mineral Appraisal - Reno, NV - 1989

Electronic Spread Sheet and Rural Appraisal - Reno, NV. - 1994

Fractional Interest - Modesto, Ca - 1998

* Both ASAC and ASFMRA have mandatory continuing education program to retain professional designation, in which I am current.

LICENSES

Certified General Real Estate Appraiser, State of California, No. AG005029

REPRESENTATIVE CLIENTS

Life Insurance Companies

Banks and Savings Banks

Federal, State & Local Governments

Special Districts

Corporate Clients

Individuals a